

Exhibit

8

3/03/2023 - Young America's v Stenger - Rein Bey

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF NEW YORK

YOUNG AMERICA'S FOUNDATION, BINGHAMTON UNIVERSITY COLLEGE
REPUBLICANS and JON LIZAK, President of the College
Republicans of Binghamton University,
Plaintiff,

v Index #: 20-CV-822 (LEK/ML)
HARVEY STENGER, President of SUNY Binghamton,
in his Official and Individual Capacities; BRIAN ROSE,
V.P. for Student Affairs of SUNY Binghamton, in his
Official and Individual Capacities; JOHN PELLETIER, Chief
of SUNY Binghamton U.P.D., in his Official and Individual
Capacities, COLLEGE PROGRESSIVES, A Student Organization
at SUNY Binghamton; PROGRESSIVE LEADERS OF TOMORROW
"PLOT", Student Association of Binghamton University
Defendants.

X

DEPOSITION OF: REIN BEY

DATE: March 3, 2023

TIME: 10:07 a.m. to 1:44 p.m.

VENUE: Webex

Reported by Monique Hines

800.523.7887

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2 APPEARANCES:

3 FOR THE PLAINTIFFS:

4 ALLIANCE DEFENDING FREEDOM

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7 Scottsdale, Arizona 85260

8

9 FOR DEFENDANTS HARVEY STENGER, BRIAN ROSE and JOHN

10 PELLETIER:

11 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL

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13 The Capitol

14 Albany, New York 12224

15

16 FOR DEFENDANTS STUDENT ASSOCIATION OF BINGHAMTON

17 UNIVERSITY:

18 ASWAD & INGRAHAM, ATTORNEYS AT LAW

19 BY: THOMAS A. SAITTA, ESQ.

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22

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5 Cross Examination by Mr. Saitta 168

6 Redirect Examination by Mr. Moore 177

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9 R E Q U E S T L I S T

10 . Mr. Moore requests flyers that are maintained 47

11 by the Deponent

12 . Mr. Moore requests the email address for Kyle 73

13 Nelson

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2 E X H I B I T I N D E X

3 Marked as

4 Described as

5 One 13

6 Complaint

7 Six 90

8 10/21/2019 and 10/22/2019 Emails from Jeff Coghlan

9 Seven 97

10 10/25/2019 email from Joseph Gallagher

11 Twelve 119

12 Facebook Post

13 Thirteen 152

14 11/19/2019 Email from Executive Vice President S.A.

15 Seventeen 114

16 Photograph

17 Nineteen 121

18 11/18/2019 B Line Post

19 Thirty-two 160

20 7/10/2020 Email from Kyle Nelson

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2 STIPULATIONS

3 It is HEREBY STIPULATED by and among the attorneys
4 for the respective parties, in accordance with the Federal
5 Rules of Civil Procedure, that this deposition may be
6 taken by the Defendant at this time, pursuant to subpoena;

7 FURTHER STIPULATED, that all objections except as to
8 the form of the questions and responsiveness of the
9 answers, be reserved until trial;

10 FURTHER STIPULATED, that the witness may read and
11 sign the deposition and make any corrections to same
12 before any Notary Public;

13 AND FURTHER STIPULATED, that if the original
14 deposition has not been duly signed by the witness and
15 returned to the attorney taking the deposition by the time
16 of trial or any hearing in this cause, a certified copy of
17 the deposition may be used as though it were the original.

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2 (The deposition commenced at 10:07

3 a.m.)

4 THE REPORTER: So then we are on the
5 record. And Ms. Bey, if you could raise your right
6 hand for me please. And do you swear or affirm the
7 testimony you're going to give today in this cause
8 will be the truth, the whole truth and nothing but
9 the truth?

10 MS. BEY: Yes.

11 WITNESS; REIGN BEY; Sworn

12 THE REPORTER: And can you just state
13 and spell your full name for the record please?

14 THE WITNESS: My name is Rein Bey.

15 That is R-E-I-N B-E-Y.

16 THE REPORTER: Okay, thank you. The
17 witness has been sworn. It's your witness.

18 MR. MOORE: Okay. Thank you.

19 DIRECT EXAMINATION

20 BY MR. MOORE:

21 Q. Good morning, ma'am, my name is
22 John Moore. I'm an Assistant Attorney General at the
23 A.G.'s Office in Albany in New York. And I represent
24 three of the defendants in this case, the Defendants
25 Rose, Stenger and Pelletier. I'm going to be asking

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2 you some questions about a lawsuit in the Northern
3 District of New York.

4 The first plaintiff is Young America's
5 Foundation. The first Defendant is Harvey Stenger.
6 The CV number is twenty CV eight twenty-two. Are you
7 familiar with this lawsuit, ma'am?

8 A. Yes, I am.

9 Q. Okay. Is there any reason you
10 can't testify honestly today to the questions that
11 I'm asking you?

12 A. No.

13 Q. Okay. And have you ever been
14 deposed before today? Have you ever been in a civil
15 deposition?

16 A. I haven't, no.

17 Q. Have you ever given testimony in
18 any kind of court proceeding before?

19 A. Not in something like this. In
20 family court, but not something like this.

21 Q. Okay. Fair enough. I'll just
22 give you the rules, so you understand how we're
23 proceeding and particularly since it's your first
24 time. I'll be asking you questions and showing you
25 documents. You'll be giving me answers. I will do

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2 my absolute best not to interrupt you while you're
3 answering.

4 And if you can do the same, that will
5 make us -- that will give us a clearer record and
6 Monique will not yell at us. The -- the second thing
7 is if you -- if you don't understand my question at
8 any time or you can't hear me because I know these --
9 these remote depositions can sometimes lead to
10 difficulty. Just let me know that you didn't hear me
11 or you didn't understand me.

12 And I'll rephrase the question until
13 you can -- until you get it correctly, okay?

14 A. Okay.

15 Q. If at any time, you -- I don't
16 think your attorney wants you to guess. So if you
17 don't know something, you don't remember something,
18 please let us know. We don't want you to -- to try
19 to come up with an answer if you don't know the
20 answer. We just want what you know and what you have
21 personal knowledge regarding.

22 And finally, if at any point during
23 the deposition you want to take a break, the only
24 thing I'd ask is that you just finish answering
25 whatever the pending question is and then we can take

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2 whatever breaks necessary.

3 A. That sounds great.

4 Q. Okay. And we'll try to get our
5 work here done quickly. I think you're ready. Can
6 you give us your full name and the spelling because
7 I've seen a couple different spellings of your first
8 name?

9 A. Yeah, yeah. It is R-E-I-N B-E-Y.
10 And I'm in the middle of a name change and it's
11 almost complete, so I guess, whichever one works for
12 me, but it's probably better to use the one without
13 the G.

14 Q. Okay. All right. Did -- did you
15 go by a different name in November 2019?

16 A. I -- I had started the name
17 change back then, so it -- it's -- the only
18 difference is the G.

19 Q. Okay. So I -- I've seen your
20 first name is spelled R-E-I-G-N?

21 A. Yes.

22 Q. And that -- that's -- that was
23 your legal name in -- in November of 2019, is that a
24 fair statement?

25 A. The legal -- the legal name was

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2 without the G.

3 Q. Okay, got you. All right. So
4 you're changing it to add the G, is that -- is that
5 correct?

6 A. Yes.

7 Q. Okay. I understand. All right.
8 Thank you. Have you ever gone by any other names
9 other than the two spellings of Reign?

10 A. No.

11 Q. Okay. And what's your date of
12 birth?

13 A. September 1st, 1999.

14 Q. And what is your current address
15 as you sit here today?

16 A. 144 Beethoven Street, Apartment
17 three, Binghamton, New York 13905.

18 Q. Okay. And how long have you
19 lived at that address?

20 A. I just moved in a month ago.

21 Q. Okay. So what we're going to be
22 talking about here is events that occurred mostly
23 during 2019. Can you give me all of the addresses
24 you lived at between?

25 THE REPORTER: Wait. Wait, we lost --

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2 I'm so sorry. We lost Mr. Sechler. I don't see him
3 anymore.

4 MR. MOORE: Oh yeah, he popped off.
5 Okay. We're going to -- we're going to put a hold
6 on.

7 (Off the record 10:12 a.m. to 10:17
8 a.m.)

9 THE REPORTER: On record.

10 BY MR. MOORE: (Cont'g.)

11 Q. Okay. Ms. Bey, sorry about the
12 delay. I'm going to re-ask the question that was
13 pending at the time we -- we lost your attorney. So
14 he's back now, so we'll -- we'll proceed. Can you
15 give me all of the addresses you've lived at between
16 November 2019 and present?

17 A. Sure. So though do you need me
18 to repeat my current one?

19 Q. We -- we already have 144
20 Beethoven Street. So let's go back to where you
21 lived in November of 2019.

22 A. I believe I lived on campus. So
23 that's 4400 Vestal Parkway East, Binghamton
24 University, Vestal, New York 13850, I think it was.

25 Q. Okay. And where did you live

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2 after that? What dates were you on campus, let's ask
3 that.

4 A. When I lived on campus, I believe
5 I lived there. Oh, actually, no, I apologize. I --
6 I got that wrong. May 2019, I moved into 1 -- 1145
7 Vestal Avenue, Binghamton, New York 13903. That's
8 where I was living in November 2019.

9 Q. Okay. Who did you live with at
10 that point?

11 A. I did not live with anyone else.

12 Q. Okay. And how long did you live
13 at 1145 Vestal Avenue Binghamton?

14 A. I lived there until May -- May
15 2021.

16 Q. Okay. And where did you live
17 after May of 2021?

18 A. I lived at 16 Martha Street,
19 Binghamton, New York 13903.

20 Q. Okay. And how long did you live
21 at 16 Martha Street?

22 A. Until January of this year.

23 Q. And was the next place you lived
24 144 Beethoven Street?

25 A. Yes.

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2 Q. Do you currently live with
3 anyone?

4 A. No.

5 Q. And did you live with anybody at
6 16 Martha Street?

7 A. No.

8 Q. Okay.

9 MR. MOORE: Monique, can we put
10 exhibit -- the first page of Exhibit One up on the
11 screen?

12 BY MR. MOORE: (Cont'g.)

13 Q. And I'm going to be referring to
14 this complaint throughout the deposition, Ms. Bey.
15 So I'm just going to first ask the stenographer to
16 put the -- the full caption up on the screen. And
17 I'll ask you some questions about that. We marked
18 this as Defendant's Exhibit One in -- at prior
19 depositions.

20 THE REPORTER: Can you see it?

21 THE WITNESS: I can. I -- I -- I'm
22 aware of that part of the --.

23 BY MR. MOORE: (Cont'g.)

24 Q. Okay. That -- that was my first
25 question. Do you recognize this document?

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2 A. I do.

3 Q. And how is it that you recognize
4 it? When did you first see it before today?

5 A. I can tell you how I recognize
6 it. And I don't believe I can tell you how I
7 recognize it, I apologize. I do not remember the
8 first time that I've seen it. But I know that I have
9 seen it on multiple occasions particularly as of
10 recent.

11 Q. Particularly, what was the answer
12 there?

13 A. Particularly as of recent.

14 Q. Okay. Were you given a draft of
15 this document before it was filed, if you know?

16 A. No.

17 Q. Okay. And is it fair to say that
18 the allegations in the complaint -- complaint of
19 incidents that occurred sometime around November of
20 2019?

21 A. Yes.

22 Q. And were you a student at
23 Binghamton University during the fall semester of
24 2019?

25 A. I was.

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2 Q. Are you currently a student at

3 B.U.?

4 A. Yes, I am.

5 Q. Okay. Let's -- let's talk about

6 your -- your history at Binghamton as a student. How

7 long have you been a college student?

8 A. This is my fifth year at

9 Binghamton in total.

10 Q. Did you go to college anywhere

11 else before Binghamton?

12 A. I occasionally attended a class

13 at Stony Brook, but I did not officially go to

14 college there, no.

15 Q. Okay. So when did you start at

16 Binghamton University?

17 A. August of 2017.

18 Q. And have you been regularly a

19 student every semester between August of 2017 and

20 spring 2023, which is the current semester?

21 A. No, I -- I was not consistently a

22 student.

23 Q. Okay. So let's talk about when

24 you were a student at Binghamton University and when

25 you were not.

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2 MR. SECHLER: Objection. Is that a
3 question, Mr. Moore?

4 MR. MOORE: Okay. I -- it -- it is,
5 but I'll rephrase it.

6 BY MR. MOORE: (Cont'g.)

7 Q. Can you tell me during what time
8 periods you were a student at Binghamton University
9 and in answering that question, you can let me know
10 whether you were a part-time student or a full-time
11 student.

12 A. Sure. I was a student from -- I
13 was a -- a full-time student from August 2017 to May
14 of, I believe, 2020 during -- that's when the
15 pandemic started. So I did not go to school for a
16 year due to that. And then I came back as a full-
17 time student in the fall semester of 2021.

18 Q. Okay. And have you been a full
19 time student for every semester between fall 2021 and
20 spring 2023?

21 A. I have, yes.

22 Q. Okay. And have you received any
23 degrees at this point from B.U.?

24 A. No, I have not. I'm -- I intend
25 to finish all three of my degrees next year.

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2 Q. Okay. When you say next year, is
3 there a projected graduation date?

4 A. May 2024.

5 Q. Okay. And what degrees are you
6 seeking at B.U.?

7 A. Computer Science, Russian
8 Studies, and Mathematics.

9 Q. Okay. And what -- what year were
10 you in, you know, when -- when I say year, I mean,
11 freshman, sophomore, junior, et cetera. What class
12 year were you in at B.U. in fall 2019?

13 A. I was a junior.

14 Q. Okay. Do you see in this caption
15 that we have up on the screen, one of the plaintiffs
16 is college -- Binghamton University College
17 Republicans, do you see that?

18 A. Yes, I do.

19 Q. Okay. Are you or were you a
20 member of the B.U. College Republicans?

21 A. Yes, I was.

22 Q. Okay. And can you give to us
23 your dates of membership in that organization?

24 A. I have been enrolled in College
25 Republicans since August 2017.

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2 Q. Okay. And have you been
3 consistently a member of that organization since your
4 -- during your entire time as a student at B.U.?

5 A. Yes.

6 Q. And have you ever held any
7 offices in that organization?

8 A. Yes. During fall 2019, I was the
9 vice president and I -- I'm currently the president.

10 Q. Okay. What time period were you
11 the vice president of College Republicans?

12 A. I was vice president only fall of
13 2019.

14 Q. Okay. So it's just that -- that
15 one semester?

16 A. Just the one semester.

17 Q. Okay. Why did you stop acting as
18 vice president at the end of fall 2019?

19 A. There was a clause in our
20 constitution that stated if the president were to
21 leave on an off semester, the -- the entire e-board
22 must be reassembled. So John Restuccia left to take
23 an internship. So therefore the government was
24 disassembled.

25 Q. Okay. And John Restuccia is the

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2 -- or was the president during fall 2019?

3 A. Yes, he was.

4 Q. Okay. How did you attain the
5 post of vice president in fall of 2019?

6 A. I was voted in.

7 Q. Okay. When did that vote take
8 place?

9 A. April 2019.

10 Q. Okay. And then when John left,
11 there was a new vote and you were -- did you run for
12 the office of vice president at that point?

13 A. I did, yes.

14 Q. Okay. But someone else was voted
15 in other than you?

16 A. Yes. And when did that vote take
17 place?

18 A. I want to say in December of
19 2019.

20 Q. And do you know who was elected
21 to the -- what -- what -- what offices are maintained
22 by the College Republicans?

23 A. Sure. It depends on the e-board,
24 but consistently there is always a president, vice
25 president and treasurer. Sometimes there can be a

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2 secretary, sometimes there can be a social media
3 manager. During that specific time, for -- for my
4 administration, it was only a president, vice
5 president and treasurer.

6 For the next administration, I believe
7 that there was a president, vice president, treasurer
8 and the secretary.

9 Q. Okay. So during your
10 administration, the president was John Restuccia,
11 correct?

12 A. Yes.

13 Q. And you were the vice president?

14 A. Yes.

15 Q. And who -- who was the treasurer
16 during that time?

17 A. His name was Tommy. I do not
18 remember his last name.

19 Q. Was that Gagliano?

20 A. Gagliano, that's the one.

21 Q. And there was no secretary during
22 that time period?

23 A. No, we did not have enough
24 members for a secretary.

25 Q. Got you. And how many members

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2 did the College Republicans have in fall of 2019 when
3 the semester began?

4 A. When the semester began, we only
5 had three members, so it was only the e-board.

6 Q. Okay. And as the semester
7 progressed, did the College Republicans attain other
8 members?

9 A. Yes.

10 Q. And who were those members and
11 when did they join?

12 A. I could not list all of them for
13 you. I -- I say approximately twenty-eight to thirty
14 people joined. I was not familiar with all of them.

15 Q. Okay. Do you remember any of
16 their names?

17 A. Yes. I remember Laran (phonetic
18 spelling), Jon Lizak, Lacey, cannot pronounce her
19 last name, I'm sorry.

20 Q. Kestecher?

21 A. Yeah, Kestecher. Lacey
22 Kestecher, Logan Blakeslee --.

23 Q. What was the name you said before
24 Logan Blakeslee?

25 A. Lacey.

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2 Q. Lacey Kestecher, okay. Sorry, I
3 -- I didn't know if there was a name in between. Are
4 there any other names you remember of those twenty to
5 thirty people who joined?

6 A. There's one I'm trying to
7 remember. I believe his name was Sebastian. But I
8 do not remember his last name.

9 Q. Okay. All right. So in December
10 of 2019, there was a vote, correct?

11 A. Yes.

12 Q. And a new e-board was elected?

13 A. Yes.

14 Q. And who were the individuals
15 elected to the e-board as of December 2019?

16 A. I believe Jon Lizak was elected
17 president, Logan Blakeslee who was elected vice
18 president. I cannot recall who was elected
19 treasurer. And I know that Lacey Kestecher was
20 elected as secretary.

21 Q. Okay. Fair enough. Now, you are
22 currently the president of the organization, correct?

23 A. Yes.

24 Q. And but -- when were you elected
25 president of the College Republicans?

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2 A. I was elected President October
3 2022.

4 Q. And does your term run for a
5 specific period?

6 A. It runs until the end of the
7 spring semester.

8 Q. Do you intend to run for that
9 office again or are you going to --?

10 A. I intend to run --.

11 MR. SECHLER: Objection to form.

12 THE WITNESS: Okay.

13 BY MR. MOORE: (Cont'g.)

14 Q. Who are the -- who are the
15 current e-board members?

16 A. So I'm President, Logan Blakeslee
17 is vice president, treasurer is Arthur O'Sullivan,
18 the Secretary is Kevin, the social media manager is
19 Ariana Kastanza (phonetic spelling) and the club
20 advisor is Sean Harrigan.

21 Q. And what is a club advisor?

22 A. So he just assists with all of
23 the other roles.

24 Q. Okay. Is he a -- a faculty
25 member or a student?

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2 A. Oh, no, no, he was a student.

3 Q. Okay. So when you joined the
4 College Republicans in August 2017, how many members
5 were -- were there?

6 A. Perhaps fifteen to twenty.

7 Q. And did the group hold regular
8 meetings when you joined in August 2017?

9 A. Oh, they did, yes.

10 Q. And how -- how frequent are those
11 meetings?

12 A. Weekly.

13 Q. And how were they organized?

14 A. Within a classroom on campus.

15 Q. Was a -- was the room reserved by
16 someone in the College Republicans or did you just
17 use it --?

18 A. The room was reserved.

19 Q. I'm sorry?

20 A. The room was reserved.

21 Q. Okay, got you. Let's move to
22 fall 2019. Did the group regularly meet during that
23 semester?

24 A. Yes.

25 Q. Okay. And where did the group

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2 meet during the fall semester of 2019?

3 A. I believe the classrooms that
4 were chosen were at random. I couldn't tell you.
5 And I don't believe that there was a lot of
6 consistency.

7 Q. Okay. And were those classrooms
8 reserved for use before meetings?

9 A. Yes.

10 Q. And who would make such
11 reservations?

12 A. I believe the president John
13 Restuccia did.

14 Q. Were you ever involved in
15 reserving classrooms for meetings?

16 A. No, the system does not allow for
17 multiple people to be responsible for making
18 reservations.

19 Q. Okay. So the system requires
20 that the leader of the group, the -- in this case,
21 the president would reserve the room?

22 A. No, it just requires that
23 somebody designated must make the reservations. It
24 cannot be multiple people at once. It can only be
25 one person throughout the entire year.

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2 Q. Okay. And during fall 2019,
3 during your vice presidency, how many meetings would
4 be held during the -- during that semester?

5 A. There were held in a --.

6 Q. Particular frequency or something
7 like that or something else?

8 A. There were -- there were held
9 weekly. And there are sixteen week in a semester.
10 So I'd say approximately thirteen, maybe twelve.

11 Q. And were regular minutes or other
12 records maintained regarding these meetings?

13 A. No, we didn't have a secretary,
14 so we couldn't have the minutes taken.

15 Q. Okay. So is it a fair statement
16 that no meeting minutes are maintained regarding fall
17 2019 as it pertains to the College Republicans?

18 A. Yes.

19 Q. Are there any other records
20 maintained by the College Republicans regarding
21 events that occurred during fall of 2019?

22 A. No.

23 Q. Okay. Were meetings organized --
24 how were -- how was the group advised that a meeting
25 would be occur -- would be occurring and where it

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2 would be occurring, if that makes sense?

3 A. Flyer hanging in a LISTSERV.

4 Q. Okay. So there'd be a listing in
5 the LISTSERV?

6 A. Yes.

7 Q. And everybody in the group would
8 get that?

9 A. Yes.

10 Q. Does the group maintain copies of
11 those -- those communications?

12 A. I believe so. I believe so
13 through the system at Binghamton, their -- if they
14 were sent through an official channel, they should be
15 maintained.

16 Q. Okay. By the university, not by
17 the College Republicans?

18 A. By the university, yes.

19 Q. Does the College Republicans
20 maintain records? Do you -- does the group have an
21 office or something like that, a file cabinet
22 anything of this sort?

23 A. We do not have an office. We
24 don't maintain records as opposed to any, perhaps,
25 record in their emails. But I -- I wouldn't

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1 3/03/2023 - Young America's v Stenger - Rein Bey
2 necessarily refer to them as records.

3 Q. Okay. And do you personally
4 maintain emails from the fall 2019 semester regarding
5 any of your involvement with the College Republicans?

6 A. No, I don't -- I don't email on
7 about the club on my personal emails, so no.

8 Q. Okay. How about on your
9 Binghamton University email?

10 A. Oh, no, no, I -- I -- that --
11 that's what I meant.

12 Q. Okay. I'm sorry. During fall
13 semester 2019, were you a member of any other student
14 groups at B.U.?

15 A. Not at the moment, no.

16 Q. Okay.

17 MR. MOORE: Monique, could we turn to
18 paragraph twelve of the complaint please?

19 THE REPORTER: Okay.

20 MR. SECHLER: And John, let me just
21 ask you this for one minute. Are you guys all
22 getting video of --?

23 MR. MOORE: Yeah.

24 MR. SECHLER: What's that?

25 MR. MOORE: No, we're -- we're not

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1 3/03/2023 - Young America's v Stenger - Rein Bey
2 videoing, yes.

3 MR. SECHLER: What do you mean we're
4 not videoing? Do you see -- no, no. Can you see me
5 for instance?

6 MR. MOORE: I cannot. You're -- it
7 doesn't look like your camera is on. And I believe
8 Rein just went off the camera to look at that
9 paragraph.

10 MR. SECHLER: Okay. But you're --
11 you're on and Monique's on.

12 MR. MOORE: I see myself and Monique.
13 Kevin Hayden from Binghamton University's council
14 office is listening but I do not see him. And so the
15 only people on the screen right now are myself and --
16 and Monique.

17 MR. SECHLER: Okay. Well, the next --
18 and -- and when we do take a break, I would like to
19 call my I.T. person because my video services have
20 been disconnected. You know, I don't typically use
21 WebEx which is probably why there's an issue because
22 I don't have a problem with Zoom or Teams.

23 Anyway, so if we could take a break at
24 some point. I'm going to see if I can get video --
25 because I don't see anybody. I -- you know, I can't

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2 see. My camera's been -- my video feed has been shut
3 off by --

4 MR. MOORE: Okay. Well, I -- I mean,
5 I'll -- I'll do whatever you want. If you want to
6 take a break now, we can do that. If you want to
7 take a break at eleven, usually what we do is try to
8 go for an hour and then take a break.

9 MR. SECHLER: Yeah, why don't we go
10 till eleven? That's fine. I can actually -- oddly,
11 I can see the complaint. I just can't see anybody's
12 video feed.

13 MR. MOORE: Huh, okay. Weird. Well,
14 we're not videoing it, so it's really, I guess that's
15 the important part of, so.

16 MR. SECHLER: Yeah, okay.

17 THE REPORTER: All good.

18 BY MR. MOORE: (Cont'g.)

19 Q. Rein, I'm going to read this
20 paragraph into the record and then, let me know if
21 you -- if I read it right. This is paragraph twelve
22 of Exhibit One which is the complaint on page four of
23 that document. And it says, Plaintiff Binghamton
24 University College Republicans.

25 And in parentheses, it says, College

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2 Republicans, is an expressive registered but
3 suspended student organization at the State
4 University of New York at Binghamton, SUNY
5 Binghamton, and an unincorporated association of SUNY
6 Binghamton students. It has approximately twenty
7 members. Did I read that correctly, ma'am?

8 A. You read it correctly, yes.

9 Q. Okay. When it says expressive,
10 what does that mean?

11 A. I am not the one who made that
12 statement, so I am unsure of what they mean.

13 Q. Okay. That's fair enough. Is it
14 accurate that the B.U. Republicans are currently
15 suspended as a student organization?

16 A. No.

17 Q. Okay. Was that student group
18 suspended in July 2020?

19 A. Yes.

20 Q. Okay. And what -- when you say
21 suspended, what do you mean?

22 A. Loss of an S.A. charter -- a
23 Student Association charter. So loss of recognition
24 by the university.

25 Q. Okay. And how -- how did you

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1 3/03/2023 - Young America's v Stenger - Rein Bey
2 become aware that the College Republicans were --
3 charter was suspended by not recognized by the
4 university?

5 A. I was made aware sometime into
6 December, I'd say. Perhaps end of November, I was
7 made aware by the president at the time.

8 Q. Okay. When in November or
9 December did you become made aware of that?

10 A. I am not sure.

11 Q. Okay. Did you receive any emails
12 from anybody at the university regarding that?

13 A. No. The email I believe was most
14 likely maintained by John Restuccia at the moment.

15 Q. Okay. Did he ever show you that
16 email?

17 A. No.

18 Q. Okay. Did you ever have any
19 communications with anybody at the university
20 including Harvey Stenger, Brian Rose or John
21 Pelletier about the suspension of the College
22 Republicans?

23 A. Only when I was -- getting back
24 the charter is when I had a conversation about it,
25 but not at the time in fall of 2019, no.

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2 Q. Okay. When did -- when you say
3 when I was getting back the charter, can you describe
4 that for me?

5 A. Sure. I -- when I wanted to
6 start back up the club along with other members, we
7 had to get a charter in order to become recognized by
8 the university again. So in order to get back the
9 charter, I went back to the student association and
10 asked them what needed to be done in order to get it
11 back.

12 Q. When did that process take place?

13 A. September, it was 2022.

14 Q. Okay. Was the College
15 Republicans -- you say charter, but did the College
16 Republicans have B-There access at any time it's
17 following --.

18 A. No.

19 Q. Let me finish the question. Did
20 the College Republicans regain B-There access at any
21 time following July 2020 -- or any time before fall
22 of 2022?

23 A. I wouldn't know because I was not
24 a member of the e-board. Only the e-board is privy
25 to that. But without -- with a suspended

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2 organization, you won't have access to B-There. So
3 my assumption is no.

4 Q. Okay. But -- do you have any
5 personal knowledge of whether the College Republicans
6 had B-There access before fall of 2002?

7 MR. SECHLER: Objection to the form of
8 the question.

9 BY MR. MOORE: (Cont'g.)

10 Q. You can answer.

11 A. No.

12 Q. Okay.

13 A. I don't believe that we did.

14 Q. Okay. Let's go to paragraph
15 thirteen and fourteen of the complaint. And I'll
16 read those into the record then ask you some
17 questions. Paragraph thirteen of Exhibit One reads
18 the purpose of College Republicans is to make note
19 and promote the principles of the Republican party
20 among members of the SUNY Binghamton campus and
21 community, to aid in the election of Republican
22 candidates at all levels of government, to encourage
23 and assist in the organization and active functioning
24 of the Republican party at local, state and national
25 levels. And to develop political skills and

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2 leadership abilities among Republican students as
3 preparation for future service by them to the
4 Republican party and community.

5 Paragraph fourteen reads, College
6 Republicans achieves this purpose primarily by being
7 an expressive organization. It engages in a wide
8 variety -- variety of expressive activities including
9 posting flyers and signs, hosting tables with
10 information, inviting speakers to campus and talking
11 with fellow students about Republican party
12 principles. Did I read that correctly, ma'am?

13 A. Yes.

14 Q. Okay. From the time you joined
15 the College Republicans in 2017 up to and including
16 November 2019, had the B.U. Republicans hosted or
17 held any events on campus?

18 MR. SECHLER: Objection, form.

19 BY MR. MOORE: (Cont'g.)

20 Q. You can answer.

21 A. Small events, yes, you know, with
22 other clubs such as College Democrats and we have
23 small speakers occasionally. Perhaps a local
24 politician or so.

25 Q. Okay. Well, let's get a little

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2 more specific than that. What's the first event you
3 remember the B.U. Republicans hosting from the time
4 you joined the organization?

5 A. There was a fireside debate with
6 college Republic -- College Democrats. I believe it
7 was in September of 2017 -- perhaps October.

8 Q. Okay. So was that a -- a joint
9 event with the College Democrats?

10 A. Yes.

11 Q. Okay. And do records exist
12 regarding that event?

13 MR. SECHLER: Objection to form.

14 THE WITNESS: I believe --.

15 BY MR. MOORE: (Cont'g.)

16 Q. I'm sorry. I didn't hear your
17 answer.

18 A. Oh, I believe a fire was made for
19 it, but I wouldn't have that --.

20 Q. Okay. And where on campus was
21 the event held?

22 A. On the Apalachin Firepit.

23 Q. On the what?

24 A. Apalachin Firepit.

25 Q. Okay. And that's on campus?

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2 A. Yes.

3 Q. What's the next event you
4 remember the College Republicans being involved in
5 after the fall 2017 fireside debate?

6 A. I believe Larry Sharpe came to
7 speak to us.

8 Q. Sharpe, how do you spell that?

9 A. I -- I want to say S-H-A-R-P-E.
10 He's the head of the Libertarian party for the
11 university.

12 Q. When did that event occur?

13 A. I do not remember. I remember it
14 occurring shortly after -- I think before the
15 elections that year.

16 Q. And what -- what year is that
17 year?

18 A. 2017.

19 Q. And where was that event held?

20 A. On campus.

21 Q. How many people attended?

22 A. I do not remember.

23 Q. Does any paperwork exist
24 regarding that event?

25 A. If it does, I do not know.

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2 Q. Okay. Following Larry Sharpe's
3 appearance, do you remember any other events
4 occurring that the College Republicans hosted or were
5 involved in?

6 A. I don't remember specific dates.
7 But I'm sure that we brought in a speaker about
8 fracking. We had discussions with College Democrats
9 again. Nothing much really, I think we had a movie
10 night, perhaps.

11 Q. Okay. Was that with another
12 group or just your group?

13 A. Just our group.

14 Q. Okay. When did -- when did the
15 fracking speaker take place?

16 A. There were two different ones.
17 One did happen in fall 2019. The other one, I do not
18 remember when it happened. I believe it occurred
19 sometime in 2018.

20 Q. Okay. And how about the -- the --
21 -- meeting with the College Democrats?

22 A. It was frequent. I do not
23 remember when exactly, I'd say, at least once every
24 two months, three months.

25 Q. Okay. And when was the movie

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2 night you reference?

3 A. I cannot recall.

4 Q. Okay. Are you familiar with two
5 events that are described in the complaint, one of
6 which we'll call the tabling event on November 14th,
7 2019?

8 A. I'm familiar with it, yes.

9 Q. Okay. And are you familiar with
10 what's been called the Dr. Laffer event on November
11 18th, 2019?

12 A. Yes.

13 Q. And let's just concentrate on
14 fall 2019 before those two events. Did the College
15 Republicans host any events on campus before the
16 tabling event?

17 A. Sure. We had the fracking
18 speaker.

19 Q. Okay. You just don't remember
20 that person's name.

21 MR. SECHLER: I -- I'm sorry, Mr.
22 Moore. Please don't interrupt the witness. I think
23 she was in the middle of an answer and you cut her
24 off.

25 BY MR. MOORE: (Cont'g.)

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2 Q. Okay, sir. If you haven't
3 finished go ahead and finish.

4 A. Oh, no. It's all right. I -- I
5 do -- I do not -- it was a woman. I do not remember
6 her name. She was from Pennsylvania. That's all I
7 remember about her. John Restuccia would probably
8 know, he's the one who invited her.

9 Q. Okay. Do you remember any other
10 events on campus in fall of 2019 before the tabling
11 event?

12 A. No.

13 Q. Okay. From November of 2019,
14 after the Dr. Laffer event, did the College
15 Republicans hold any events on campus?

16 MR. SECHLER: Objection, foundation.

17 BY MR. MOORE: (Cont'g.)

18 Q. You can answer.

19 A. I -- I -- I -- I need you to
20 repeat the question.

21 Q. Okay. All right. You're
22 familiar with the Dr. Laffer event on November 18th,
23 2019, correct?

24 A. Yes.

25 Q. Okay. My first question is,

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2 after the Dr. Laffer event, did the College
3 Republicans hold any meetings, any group meetings
4 after the Dr. Laffer event?

5 MR. SECHLER: And Mr. Moore, are you
6 asking all the way up until today or is there --?

7 MR. MOORE: During the fall 2019
8 semester.

9 MR. SECHLER: Okay, thank you.

10 THE WITNESS: Immediately after our
11 meetings were canceled for a while.

12 BY MR. MOORE: (Cont'g.)

13 Q. Who canceled them?

14 A. I do not know. I believe John
15 Restuccia did.

16 Q. Okay.

17 A. I was -- I'm not aware. I don't
18 know if it's because we lost our charter at that
19 specific moment or if it's because it was just his
20 own choice due to what happened.

21 Q. Okay. So do you recall any
22 meetings during 2019 after the Dr. Laffer event of
23 the College Republicans?

24 A. I believe the next meeting we had
25 was that the -- the election. I can't remember. I -

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2 - I can't recall anything that happened -- anything
3 else that might have happened.

4 Q. Okay, got you. And then, we're
5 going beyond the fall of 2019. From fall 2019 until
6 the present time, had the B.U. Republicans hosted or
7 held any events on campus?

8 MR. SECHLER: Objection, lack of
9 foundation.

10 BY MR. MOORE: (Cont'g.)

11 Q. You can answer.

12 A. Yes.

13 Q. Okay.

14 A. Small events I have organized
15 during my tenure as president.

16 Q. And what events were those and
17 when did they occur?

18 A. I organized a speaker from
19 students for us to come -- I believe in November
20 2022. I organized a speaking event with Sophia
21 Resciniti before the elections. I believe that's it.

22 Q. Okay. So --.

23 MR. SECHLER: Wait, I -- I'm sorry.

24 Is the witness still answering?

25 BY MR. MOORE: (Cont'g.)

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2 Q. I believe that's it, were her

3 last words. Were you still answering, ma'am?

4 A. No, I wasn't.

5 MR. SECHLER: Okay, thank you. Sorry

6 about that.

7 BY MR. MOORE: (Cont'g.)

8 Q. Okay. So is it fair to say you

9 hosted two speakers on campus during fall 2022?

10 A. Yes. Not to a large scale, but

11 yes.

12 Q. Okay. Do you know between

13 November 18th, 2019, and when you became president in

14 2022, do you know if the Binghamton University

15 College Republicans hosted any events or speakers on

16 campus?

17 A. We did not.

18 Q. Okay. Did the College

19 Republicans hold any meetings between November 2019

20 and fall 2022?

21 MR. SECHLER: Objection, lack of

22 foundation.

23 BY MR. MOORE: (Cont'g.)

24 Q. You can answer.

25 A. In fall 2020 -- sorry, in

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2 February of 2020, we had an informal meeting. I
3 don't believe it was S.A. recognized. And in
4 September of 2022, we had another informal meeting.
5 However, I was not aware at the time that it was not
6 S.A. recognized.

7 Q. You weren't an officer during
8 2020 and 2021, correct?

9 A. No.

10 Q. And you stated during some of
11 that time you were not a student?

12 A. Yes.

13 Q. Is it fair to say that during the
14 time you were not a B.U. student, you don't know if
15 the group had any meetings?

16 A. I would have known because I was
17 still in the group chat. For the College
18 Republicans, I would have known if they had held a
19 meeting. Due to losing the chart -- charter, I don't
20 believe that they had access to B-There or their
21 LISTSERV or the Republicans email. So the only way
22 of informing people would have been through that
23 group chat. So they did not have a meeting.

24 Q. Okay.

25 A. From what I know.

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2 Q. From what you know?

3 A. Yes.

4 Q. From the time you joined the B.U.
5 Republicans in 2017 up until November of 2019, had
6 the B.U. Republicans posted flyers or signs on
7 campus?

8 MR. SECHLER: Objection, form.

9 THE WITNESS: Yes.

10 BY MR. MOORE: (Cont'g.)

11 Q. And can you tell me about those?

12 A. It was rare -- rarely did we post
13 flyers. I think it was just to inform people about
14 meetings.

15 Q. And would a post the flyer for
16 every meeting?

17 A. No, not as far as I was
18 concerned, but I was not on the e-board, so I did not
19 know officially.

20 Q. Okay. Well, I'm asking about
21 what you know. Do you know from the time you joined
22 the B.U. Republicans in 2017 up to and including
23 November 2019, can you specify for me any times that
24 the B.U. Republicans posted flyers on campus?

25 MR. SECHLER: Objection, asked and

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1 3/03/2023 - Young America's v Stenger - Rein Bey
2 answered.

3 BY MR. MOORE: (Cont'g.)

4 Q. You can answer.

5 A. No, in that case then, no.

6 Q. Okay. From November 2019 after
7 the Dr. Laffer event until the present time which is
8 March 2023, have the B.U. Republicans posted any
9 flyers or signs on campus that you're aware of?

10 MR. SECHLER: Objection, form.

11 THE WITNESS: Yes.

12 BY MR. MOORE: (Cont'g.)

13 Q. Okay. Can you tell me about all
14 of those?

15 A. We have weekly meetings, so every
16 week we posted flyers.

17 Q. And where would you post flyers?

18 A. All around campus.

19 Q. Would there be a flyer posted for
20 every meeting held on campus?

21 A. Yes.

22 Q. And were -- are copies maintained
23 of those flyers?

24 A. Can you repeat that?

25 Q. Are copies maintained of the

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2 flyers posted by the College Republicans organization
3 on campus between November 2019 and the present time?

4 A. I do not. I can't refer to any
5 flyers before my time as president, so I would not
6 know. But forward from my time as president, I do
7 have records of every single flyer that we've posted.

8 Q. Okay. I'm going to make a
9 request on the record for copies of flyers that
10 you've maintained.

11 MR. SECHLER: Yeah. And Ms. Bey, let
12 me respond to that. Mr. Moore, I appreciate a follow
13 up of anything that comes out of this that you'd like
14 us to consider and we will.

15 MR. MOORE: Yes, I will -- I will put
16 every request in writing.

17 MR. SECHLER: Thank you.

18 MR. MOORE: And copy you, Phil.

19 MR. SECHLER: Yeah. And Ms. Bey, you
20 do not need to respond to that request. Thank you.

21 MR. MOORE: Yeah, I will not make the
22 request directly to Ms. Bey. I will make it to
23 counsel. I'm putting a request on the record so the
24 witness can be aware that the request is coming.

25 BY MR. MOORE: (Cont'g.)

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2 Q. Have the College Republicans
3 ever been prevented from anyone by -- from posting
4 flyers on campus during your time as president?

5 A. During the first week, our flyers
6 were ripped down. It was reported by my vice
7 president. And since then, they have seemingly done
8 better in terms of the flyers being ripped down.
9 However, other -- other students have tried to either
10 rip our flyers while they're on the wall or turn them
11 over or other things to make sure that it's not --
12 our club is not promoted, so.

13 Q. Do you know who ripped your
14 flyers down on the occasion that occurred?

15 A. Apparently the -- according, I
16 believe TUPD. The -- the camera was too blurry.

17 Q. Okay. So is the answer you don't
18 know who ripped it down?

19 A. No, I do not.

20 Q. And this was during the calendar
21 year 2022?

22 A. Yes.

23 Q. From the time you joined the B.U.
24 Republicans in 2017 up to and including November of
25 2019, had the B.U. Republicans hosted tables with

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2 information?

3 MR. SECHLER: Objection.

4 THE WITNESS: Yeah.

5 BY MR. MOORE: (Cont'g.)

6 Q. Okay. How many times?

7 A. I was not a member of the e-board
8 at the moment, so I cannot recall.

9 Q. How do you know that the College
10 Republicans hosted tables then?

11 A. They would state that they were
12 going to host tables in -- in the meeting.

13 Q. Okay. Were you present at any of
14 these tabling events?

15 A. I have only -- I've only been
16 present once and I was tabling. This is when I first
17 became vice president.

18 Q. Okay. What tabling event did you
19 attend?

20 A. U-Fest in 2000 -- August 2019.

21 Q. What is U-Fest?

22 A. It's a festival held by the
23 university to promote the clubs that had passed.

24 Q. Okay. Where -- that was in
25 August 2019?

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2 A. Yes.

3 Q. And where on campus was that
4 tabling located?

5 A. In the Peace Quad.

6 Q. And you were present for this
7 tabling?

8 A. Yes.

9 Q. And does any paperwork or records
10 exist regarding this tabling?

11 A. I wouldn't know.

12 Q. Was this a general tabling where
13 every student group was given a table?

14 A. Yes.

15 Q. Okay. Did you need to make
16 reservations for those tables, or -- or how did --
17 how did this -- you become aware of this tabling?

18 A. John Restuccia asked me to table
19 with him.

20 Q. Okay. So is it fair to say that
21 Mr. Restuccia was involved in organizing that?

22 A. Yes.

23 MR. SECHLER: Object to form.

24 BY MR. MOORE: (Cont'g.)

25 Q. Okay.

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2 A. Actually I wouldn't say that it
3 was fair. I don't -- I technically do not know if
4 he's the person who reserved the table or not.

5 Q. Okay, got you. Other than the U-
6 Fest in August of 2019, was there any other occasion
7 during the fall of 2019 or before when the College
8 Republicans participated in a tabling event?

9 A. U-Fest 2018 and U-Fest 2017, I
10 discovered the College Republicans through U-Fest in
11 August 2017.

12 Q. Okay. So you -- you had a
13 conversation with someone at the table?

14 A. Yes.

15 Q. Okay. Were you involved in the
16 tabling event at U-Fest in 2018?

17 A. I stopped by, but I was not
18 involved in it.

19 Q. Okay. Were you involved in any
20 other tabling events that the College Republicans
21 have hosted before November 2019?

22 A. No.

23 Q. And are you aware of any other
24 tabling event other than what you've specified hosted
25 by the College Republicans before November 2019?

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2 A. Yeah.

3 Q. Okay. From -- after the Dr.

4 Laffer event in November 2019 until the present time,

5 have the B.U. Republicans hosted any tables with

6 information?

7 MR. SECHLER: Objection, lack of

8 foundation.

9 BY MR. MOORE: (Cont'g.)

10 Q. You can answer.

11 A. Can you repeat the questions?

12 Q. Sure. From November 2019, after

13 the Dr. Laffer event, until the present time, had the

14 B.U. Republicans hosted any tables with information

15 on the Binghamton University campus?

16 MR. SECHLER: Same objection.

17 BY MR. MOORE: (Cont'g.)

18 Q. Did you hear the question, ma'am?

19 A. I did. I wasn't sure. I -- I

20 wasn't sure if I should answer you.

21 Q. Oh, you can answer, ma'am.

22 A. Yes, within the past week we had

23 bake sales. And that is all.

24 Q. Where was the bake sale held?

25 A. Three times in the library

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2 breezeway and once in the union lobby.

3 Q. You said three times in the
4 library breezeway?

5 A. Yes.

6 Q. And you said once somewhere else,
7 what was the other place?

8 A. In the union lobby.

9 Q. These were all within the last
10 week?

11 A. Yes.

12 Q. Okay.

13 A. Not this week -- sorry, I should
14 -- yes, last week. Like Mon -- Mon -- so Monday,
15 Tuesday, Thursday, Friday.

16 Q. Okay. So those have all been
17 this week?

18 A. Last week until the -- the 24th,
19 I believe.

20 Q. Okay. Was this bake sale held to
21 promote any kind of event or raise money for
22 something?

23 A. To raise money.

24 Q. Okay. And what was it to raise
25 money for?

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2 A. Hopefully to attain a -- a

3 speaker.

4 Q. Okay. And was the bake sale --

5 were there any other groups involved in the bake

6 sale?

7 A. No.

8 Q. Okay. And did you reserve space

9 to the library breezeway for the three days you were

10 there?

11 A. Yes.

12 Q. Okay. And how did you do so?

13 A. Through B-There -- I don't

14 currently have access to B-There.

15 Q. Got you. And did you reserve

16 space in the union lobby for the bake sale?

17 A. Yes.

18 Q. Okay. How did you do that?

19 A. Through B-There.

20 Q. Are there any other tabling

21 events that you're aware of from the date of the Dr.

22 Laffer event until the present time other than those

23 bake sales you just testified for me?

24 A. No.

25 Q. Okay.

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2 MR. MOORE: Philip, it's eleven zero
3 five. Do you want to take a break?

4 MR. SECHLER: Yeah, John, thank you.
5 That would be great. I will -- I'm going to -- I
6 think restart my computer, so I'll probably be off.
7 Or I'm not going to restart my computer. I'm going
8 to sign back into the WebEx link. And I'm going to
9 call my I.T. person to see if I can get video re-
10 established.

11 MR. MOORE: I'm pretty sure you could
12 go on as a guest and that will -- that's how I
13 generally do it.

14 (Off the record, 11:06 a.m.)

15 (On the record; 11:17 a.m.)

16 THE REPORTER: .
On the record.

17 BY MR. MOORE: (Cont'g.)

18 Q. Ms. Bey, do you understand that
19 you're still under oath?

20 A. Yes.

21 Q. Okay. I'm not asking you about
22 any communications you've had with the plaintiff's
23 attorneys in this matter, but did you meet with or
24 communicate with anyone to prepare for today's
25 deposition?

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2 MR. SECHLER: That's a yes or no, Ms.

3 Bey.

4 THE WITNESS: Yes.

5 BY MR. MOORE: (Cont'g.)

6 Q. And did you meet with anybody

7 other than attorneys for the Plaintiffs in this

8 matter?

9 A. No.

10 Q. Okay. You understand that the

11 College Republicans are still a plaintiff in this

12 litigation, correct?

13 A. Yes.

14 Q. Is your understanding that all of

15 the club's members are aware of the suit?

16 A. As of current, yes.

17 Q. Okay. And how many members does

18 the club currently have?

19 A. I would say, it's hovering over

20 thirty.

21 Q. Okay. Have the College

22 Republicans ever held meetings to talk about this

23 lawsuit?

24 A. No.

25 Q. That didn't involve plaintiff's

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2 attorneys being involved in it.

3 A. No. Majority of them were not
4 there at the time, so there was no need to speak
5 about it with them.

6 Q. Okay. Well, how did the current
7 club membership become aware of the lawsuit then?

8 A. I made anyone who joined that --
9 I made anyone who joined aware that we were in a
10 lawsuit.

11 Q. And how would you do that?

12 A. I would just simply tell them
13 that we were in a lawsuit due to events back in 2019.

14 Q. But there's never been any formal
15 discussion of that lawsuit at a meeting which you
16 were involved in -- at the College Republicans that
17 did not involve the plaintiff's attorneys?

18 A. No.

19 Q. Okay. As president or vice
20 president of the College Republicans, did you ever
21 meet with any members of the B.U. Administration?

22 A. Not as vice president. As -- as
23 president, if we are counting the Student Association
24 as part of the Administration, then, yes.

25 Q. Okay. Well, the Student

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2 Association is a different group and their attorney
3 just appeared, Mr. Saitta. We do not represent the
4 Student Association.

5 A. Okay.

6 Q. What I'm asking about is the
7 Binghamton University Administration, not including
8 the Student Association. Are you aware of that?

9 A. No.

10 Q. Okay. The answer's, no? Thanks.
11 Did you review any documents to prepare for today's
12 deposition?

13 A. No. No, I mean, well, not -- not
14 today.

15 Q. Well --

16 A. And --.

17 Q. -- at any time before today, did
18 you review any documents to prepare for today's
19 deposition?

20 A. Yes.

21 Q. Okay. What documents did you
22 review?

23 A. The lawyers had sent over -- my
24 lawyers had sent over documents to me.

25 Q. And I'm not asking you about any

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2 communications with the lawyers, but I am asking you
3 what documents you reviewed.

4 MR. SECHLER: And Mr. Moore, let me
5 just state an objection on that question for you
6 because in my experience that question seeks work
7 product. And I don't know if you have taken a
8 position on this or whether the lawyers have.

9 I certainly want to make sure that
10 whatever I say is consistent with what you guys have
11 agreed in the past. But I would -- if -- if there
12 was no precedent on that, I'm willing to object and
13 instruct the witness not to answer on grounds of work
14 product.

15 MR. MOORE: Well, I don't think that's
16 a valid objection.

17 BY MR. MOORE: (Cont'g.)

18 Q. I'm not asking for any
19 communications or emails that you've had with
20 attorneys. What I'm asking is if you reviewed any
21 documents to prepare for the deposition. For
22 example, when I sent a number of exhibits. Did you
23 review those exhibits that I sent before today's
24 deposition?

25 MR. SECHLER: And let me just

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2 interject, Ms. Bey.

3 THE WITNESS: No.

4 MR. SECHLER: I'm sorry. Mr. Moore,
5 you can certainly ask that question. My objection
6 goes to another question, which is what did your
7 attorneys select for you to review? I don't know.
8 Certainly, there are a number of cases that would
9 regard that as work product. I don't know what you
10 have done in the past in these depositions.

11 As you know, this is my first
12 deposition in the case. I just want to make sure
13 that whatever we're doing is consistent with what the
14 parties have done in the past with respect to that
15 question.

16 MR. MOORE: That -- this issue has not
17 come up in the -- in the context of an objection, I
18 believe. Every deposition we've had, the witness has
19 been asked, what documents did you prepare, did you
20 review to prepare for today's deposition? In the
21 context of, it does not involve your discussions with
22 counsel.

23 MR. SECHLER: Yeah.

24 MR. MOORE: I don't believe, for
25 example, reading the complaint or reviewing her own

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2 emails or something like that is -- is guarded by any
3 privilege. Certainly, your emails to her would be,
4 but I don't believe that reviewing documents is co --
5 covered by any privilege. Communications with
6 attorneys are.

7 MR. SECHLER: Well, we can disagree on
8 that evidentiary point. But the question you just
9 asked about whether she has reviewed the exhibits you
10 selected, I'm fine with.

11 MR. MOORE: Okay. We'll -- we'll get
12 to that.

13 BY MR. MOORE: (Cont'g.)

14 Q. My first question is, other than
15 communications with counsel, did you review any
16 documents to prepare for today's delete -- today's
17 deposition?

18 A. None of the exhibits, no.

19 Q. Okay. Other than the exhibits,
20 did you review any documents to prepare for today's
21 deposition?

22 A. The complaint.

23 Q. Okay. Other than the complaint,
24 which is up on the screen right now, did you review
25 any other documents to prepare for today's

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2 deposition?

3 A. No.

4 Q. Okay. Fair enough. You told me
5 earlier that some flyers that you prepared were
6 ripped down?

7 A. Yes.

8 Q. What did those flyers say?

9 A. I believe it was just our -- our
10 first meeting of the semester. I think that's all
11 that they said.

12 Q. Okay. And you said you
13 complained to the police about those flyers being
14 ripped out?

15 A. My vice president complained to
16 the police, yes.

17 Q. Was a police report filed?

18 A. I am not aware.

19 Q. Okay. And is it fair to say, you
20 wouldn't maintain a copy of that police report?

21 A. Yes.

22 MR. SECHLER: Objection to form.

23 BY MR. SULLIVAN: (Cont'g.)

24 Q. Have you ever been involved in
25 any other student group on campus other than the

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2 College Republicans during your time at Binghamton
3 University?

4 A. Yes.

5 Q. What other groups have you been a
6 member of at Binghamton University?

7 A. Economics Club, Knitwits, Video
8 Game Association. I'd say that that's it. And I'm
9 currently a member of S.A. Congress.

10 Q. Okay. I want to ask about the
11 video game club or the Economics Club. What is
12 Knitwits?

13 A. You crochet or knit.

14 Q. Okay. Got you. Knit as in K-N-
15 I-T-W-I-T-S?

16 A. Yes.

17 Q. Understood. And what is your
18 involvement in the S.A. Congress?

19 A. We simply vote on legislation or
20 discuss legislation that we feel aids the school.

21 Q. Okay. Got you. And how did you
22 become a member of the S.A. Congress?

23 A. I went to a meeting a -- a
24 general body meeting that they had.

25 Q. Okay. Is there an election that

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2 by which you're appointed to that position, do you
3 volunteer, how -- how is that, how do you become a
4 member?

5 A. You volunteer.

6 Q. Okay. Got you. All right.

7 Let's go back to the ca -- the -- the caption of this
8 lawsuit, which is the first page.

9 MR. MOORE: Monique, if you could put
10 that up on the page?

11 BY MR. MOORE: (Cont'g.)

12 Q. And there is an individual named
13 in the plaintiff's portion of the caption, John
14 Lizak. Do you see that?

15 A. Yes.

16 Q. Do you know Mr. Lizak?

17 A. Not personally, but I know Mr.
18 Lizak, yes.

19 Q. How long have you known him?

20 A. Since 2019.

21 Q. When's the last time you spoke
22 with him?

23 A. Perhaps, February of 2020, at
24 that informal meeting, I think. Other than within
25 that group chat, we spoke generally to everybody. I

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2 did not have a personal conversation with him --

3 Q. Okay.

4 A. -- since 20 -- February 2020.

5 Q. Got you. Is he a current B.U.

6 Republicans member?

7 A. No.

8 Q. Do you know when he left that

9 organization?

10 A. He left when he was elected out

11 of office.

12 Q. When did that occur?

13 A. May 2022. Sorry, not May 2022.

14 Was it from -- no, that is correct. May 2022.

15 Q. So is it fair to say that Mr.

16 Lizak was the President of that organization from the

17 time he was elected in December 2019, until May of

18 2022?

19 MR. SECHLER: Objection.

20 MR. MOORE: Okay. Your objection is

21 on the record, but I didn't hear the witness' answer.

22 THE WITNESS: Yes.

23 BY MR. MOORE: (Cont'g.)

24 Q. Have you ever discussed this

25 lawsuit with Mr. Lizak?

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2 A. He reached out to me, I believe,
3 also in February of 2020 and asked me for my number
4 to give to somebody about the lawsuit, but I've never
5 personally discussed the lawsuit with him, no.

6 Q. Okay. All right. Are you aware
7 that he made a request to withdraw as a plaintiff?

8 A. I've been made aware of this,
9 yes.

10 Q. Do you know why he moved to
11 withdraw as a plaintiff?

12 MR. SECHLER: And -- and I would
13 object at this point. I'm sorry, Ms. Bey. I need to
14 interrupt and just instruct you not to reveal the
15 contents of any conversations you've had with
16 counsel.

17 MR. MOORE: Okay. Again, I want this
18 to be an over -- overarching statement. I'm not
19 asking about any communications with counsel. What
20 I'm asking is, are you aware why he made a request to
21 withdraw?

22 MR. SECHLER: And Ms. Bey, if you can
23 answer that without revealing conversations with
24 counsel, go ahead. But if you only can answer that
25 question with respect to conversations with counsel,

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2 then I instruct you not to.

3 THE WITNESS: No, it's -- it's okay.
4 It's okay. I was just made aware of the fact that he
5 withdrew. I -- I would say, I was not told why. I
6 do not know him personally, so I do not know why. So
7 I -- I don't know why he withdrew. I was just made
8 aware that he was withdrew sometime recently.

9 MR. MOORE: Okay.

10 BY MR. MOORE: (Cont'g.)

11 Q. Do you know John Restuccia? You
12 mentioned his name --.

13 A. Yes, I do.

14 Q. Okay. How long have you known
15 John?

16 A. I'd say since 2018. I forgot
17 when -- I -- I forgot when I met him, but he was a
18 member of the club sometime around the time that I
19 first joined, I believe.

20 Q. Okay. When's the last time you
21 spoke with John?

22 A. Last year. I'd say in perhaps,
23 maybe November.

24 Q. Did you discuss his deposition in
25 this case?

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2 A. I was not -- I was not aware that
3 I knew he was involved, but I -- I don't know
4 anything about a deposition.

5 Q. Okay. But my question was, did
6 you discuss with John Restuccia, your de -- his
7 deposition in this case?

8 A. No.

9 Q. Okay. Is he a current B.U.
10 Republicans member?

11 A. No.

12 Q. And did he leave in December of
13 2019 as you previously mentioned?

14 A. Yes.

15 Q. Have you discussed this lawsuit
16 with him?

17 A. Other than -- I'm saying no.

18 Q. Okay. You mentioned her name
19 before, but do you know Lacey Kestecher?

20 A. Yes.

21 Q. And how long have you known
22 Lacey?

23 A. Since 2019. ... in 2019.

24 Q. Okay. When's the last time you
25 spoke with Lacey?

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2 A. Probably that same February of
3 2021 when I also spoke with Lizak -- Lizak.

4 Q. Okay. It's fair to say, Lacey is
5 not a current B.U. Republicans member?

6 A. Yes.

7 Q. What years was she a member, if
8 you know?

9 A. From fall of 2019, I do not
10 remember. She transferred at some point in time, but
11 I do not recall when she transferred.

12 Q. Do you know what year she was an
13 officer of the organization?

14 A. I'd say at least from December
15 2019 to May 2021, if not longer. As I mentioned, I
16 don't remember when she transferred.

17 Q. Okay. Have you discussed this
18 lawsuit with her?

19 A. No.

20 Q. She is identified as a witness in
21 this matter. Do you have any personal knowledge of
22 what event she was a witness to?

23 A. Can you rephrase the question?

24 Q. Well, do you have any knowledge
25 of what incidents alleged in the complaint Lacy

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2 Kestecher was a witness to?

3 MR. SECHLER: Objection to form.

4 THE WITNESS: Can you rephrase the
5 question again? I'm sorry. I'm a little unsure how
6 to answer.

7 MR. MOORE: Okay.

8 BY MR. MOORE: (Cont'g.)

9 Q. You've read the complaint,
10 correct?

11 A. Yes.

12 Q. Do you know what allegations in
13 the complaint Lacy Kestecher would've been a witness
14 to?

15 MR. SECHLER: Same objection.

16 THE WITNESS: The tabling event and
17 the Laffer event.

18 MR. MOORE: I'm sorry.

19 THE WITNESS: Sorry. The tabling
20 event and the Laffer event, correct.

21 BY MR. MOORE: (Cont'g.)

22 Q. I'm going to ask you about some
23 other witnesses who have been identified by
24 Plaintiff's attorneys in this -- in discovery in this
25 case. And I'm going to ask you what you know about

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2 them. You mentioned this individual, Logan
3 Blakeslee. And that's B-L-A-K-E-S-L-E-E. Do you
4 know Logan?

5 A. Yes.

6 Q. Who is he?

7 A. He's currently the vice president
8 of College Republicans.

9 Q. What information about the
10 allegations in the complaint, if you know, does Logan
11 have?

12 A. I believe he was a witness to the
13 Laffer event.

14 Q. Okay. Have you discussed the
15 claims of the case with Logan outside the presence of
16 attorneys?

17 A. No.

18 Q. Are you in current -- you're --
19 you're currently in contact with Logan though,
20 correct?

21 A. Yes.

22 Q. You've never discussed the
23 lawsuit with him?

24 MR. SECHLER: Objection. Asked and
25 answered.

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2 THE WITNESS: No. He -- I'm -- I'm
3 aware he's going to -- he's going to do a deposition,
4 but we discussed that in front of the lawyers. There
5 is not much point to talk about the lawsuit outside
6 of the lawyers -- outside of the presence of the
7 lawyers.

8 BY MR. MOORE: (Cont'g.)

9 Q. Do you know Kyle Nelson?

10 A. Not well, but yes.

11 Q. How do you know Kyle?

12 A. I believe he was -- he was
13 technically the president that was elected after John
14 Lizak was no longer president.

15 Q. Do you know what time period he
16 was president of the B.U. Republicans?

17 A. I suppose from May 2019 to
18 September 2020. Sorry -- sorry, May -- sorry --
19 sorry. May -- in May 2022 to September 2022. I am
20 so sorry.

21 Q. Okay. Got you. Have you
22 discussed the claims in this case with Kyle?

23 A. No.

24 Q. Do you know what information
25 about the allegations in the complaint Kyle has?

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2 MR. SECHLER: Objection to form.

3 THE WITNESS: I cannot recall.

4 BY MR. MOORE: (Cont'g.)

5 Q. Did you ever know what

6 information Kyle had?

7 MR. SECHLER: Same objection.

8 THE WITNESS: No.

9 MR. MOORE: Okay.

10 BY MR. MOORE: (Cont'g.)

11 Q. Are you currently in contact with

12 Kyle?

13 A. No.

14 Q. Do you have an address, a phone

15 number or an email address for Kyle Nelson?

16 A. Perhaps, I believe he's still on

17 the LISTSERV, so I have an email address for him.

18 But not -- no, nothing -- no other information

19 regarding Kyle.

20 Q. Okay.

21 MR. MOORE: I'm going to make a

22 request on the record that you provide that email

23 address to your attorneys. I will tell you before

24 you start objecting, Phil, that I've had

25 communication with Steve Miller earlier today.

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2 And he communicated to me that he does
3 not have Kyle Nelson's contact information. So to
4 the extent that this witness is a member of the B.U.
5 Republican and is possession of any of that, I would
6 like that information. So I'm going to make a
7 request and I'll follow up by letter.

8 MR. SECHLER: That sounds fine, Mr.
9 Moore. Thank you. And Ms. Bey, you do not need to
10 respond to that request. On the record.

11 MR. MOORE: I'm not making the request
12 to her, Phil. I'm making it you.

13 MR. SECHLER: Okay. I --I -- I will
14 respond to what I hear -- get from you after this
15 deposition. Thank you, Mr. Moore.

16 MR. MOORE: Okay. Fair enough.

17 BY MR. MOORE: (Cont'g.)

18 Q. Do you know the name Sebastian
19 Roman, Ms. Bey?

20 A. Yes.

21 Q. Who is Sebastian Roman?

22 A. He was a club member during -- he
23 -- he -- he -- he -- he's been a club member since --
24 since I've joined. And I believe he was a club
25 member up -- up until fall of 2020. I believe he

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2 graduated in 2020, actually.

3 Q. Okay. Got you. Do you know what
4 information about the allegations in the complaint
5 Sebastian would have?

6 A. A witness of the Art Laffer -- at
7 the Art Laffer event.

8 Q. Okay. Have you discussed the
9 claims in this case with Sebastian?

10 A. I have not seen him since then.
11 So no.

12 Q. When's the last time you spoke
13 with Sebastian?

14 A. I believe when -- I believe when
15 we voted for a new government in two thousand --
16 December 2019.

17 Q. December 2019?

18 A. Yes.

19 Q. Do you have a current address,
20 phone number or email address for Sebastian Roman?

21 A. I do not know.

22 Q. Okay. I also briefly mentioned
23 this person, Thomas Gagliano. Do you recognize that
24 name?

25 A. Yes.

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2 Q. Who is Thomas Gagliano?

3 A. He was the treasurer of College
4 Republicans on fall 2019.

5 Q. And what information about the
6 allegations in the complaint does Thomas have, if you
7 know?

8 MR. SECHLER: Objection to form.

9 MR. MOORE: You can answer.

10 THE WITNESS: I believe he was also a
11 witness to the Art Laffer event, I -- I believe. I
12 cannot recall well.

13 Q. Okay. Have you ever discussed
14 the claims in this case with Thomas?

15 A. No, I also have not spoken to him
16 since December 2019.

17 Q. Okay. Do you know what -- what -
18 - what time period he was a club member?

19 A. He was a club member for -- for
20 an unspecified amount of time before fall of 2019. I
21 do not remember when he joined, but I do remember him
22 being present in 2018.

23 Q. Okay. Is he still a club member?
24 I guess what I said.

25 A. No, I believe he's graduated.

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2 Q. Do you know when he left the
3 organization?

4 A. I do not.

5 Q. And do you have an address, phone
6 number or email address for Thomas Gagliano?

7 A. No.

8 Q. You know the name Spencer Haynes,
9 that's H-A-Y-N-E-S?

10 A. Yes, I do.

11 Q. Who is Spencer Haynes?

12 A. He was a club member since the
13 time I joined College Republicans.

14 Q. So he was there in 2017 when you
15 joined?

16 A. Yes, he was.

17 Q. Is he still a club member?

18 A. No, he's not. I believe he's
19 graduated. I'm sorry.

20 Q. Are you ready to proceed?

21 A. Yes. It just gave me a
22 notification. I apologize.

23 Q. It's okay. What time period was
24 Spencer Haynes a club member?

25 MR. SECHLER: Objection to form.

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2 MR. MOORE: If you know?

3 THE WITNESS: I believe he was a club
4 member before 2017, but I -- I'll -- I will say, no,
5 I do not know.

6 BY MR. MOORE: (Cont'g.)

7 Q. Do you know -- you said he
8 graduated, right?

9 A. He graduated, yes.

10 Q. Do you know when he graduated?

11 A. Either in 2020 or 2021. I cannot
12 recall.

13 Q. And do you know if he was an
14 active club member up until his graduation?

15 A. No, he was not.

16 Q. He was not. When did he leave
17 the organization?

18 A. He started disassociating after
19 twen -- two -- December 2019.

20 Q. Do you know why he started
21 disassociating after December 2019?

22 MR. SECHLER: Objection. Foundation.

23 BY MR. MOORE: (Cont'g.)

24 Q. Your attorney was speaking. What
25 was your answer?

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2 A. I simply believe it wasn't be --
3 it was because he didn't have -- that there were no
4 club meetings. So he had no reasons to --

5 Q. ...

6 A. -- continue associating.

7 Q. Okay. Understand. Sorry to
8 interrupt. Have you ever discussed the claims in
9 this case with Spencer Haynes?

10 A. No.

11 Q. Are you currently in contact with
12 Spencer Haynes?

13 A. No.

14 Q. Do you have an address, phone
15 number, social media, contact or email address for
16 Spencer Haynes?

17 A. I have a social media contact for
18 Spencer Haynes.

19 Q. And what social media contact do
20 you have with him?

21 A. Facebook.

22 Q. Okay. Do you have social media
23 contact with Thomas Gagliano?

24 A. I think he -- I think I might
25 have a contact with him on Facebook, but I can't

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2 recall though.

3 Q. Okay. How about Sebastian Roman?

4 A. I don't believe I have any

5 contact with him.

6 Q. And Kyle Nelson?

7 A. I don't have any contact with him

8 either.

9 Q. Do you know the name Dylak Roth
10 (phonetic spelling)?

11 A. No, I do not.

12 Q. Do you know the name Samuel
13 Kessler, K-E-S-S-L-E-R?

14 A. Yes.

15 Q. Who is Samuel Kessler?

16 A. He was a member of College
17 Republicans in fall of 2018. And he was also a
18 member briefly in fall of 2022.

19 Q. Okay. Was he a member in fall of
20 2019?

21 A. Yes.

22 Q. Okay. So you said 2018 and 2019.
23 Did he --?

24 A. Oh, no, I meant 2019. I
25 apologize. I meant 2019 and 2022.

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2 Q. Okay. Was he consistently a
3 member of that group between fall of 2019 and fall of
4 2022, if you know?

5 MR. SECHLER: Objection -- objection.
6 Foundation.

7 MR. MOORE: You can answer.

8 THE WITNESS: I can't recall.

9 MR. MOORE: Okay.

10 BY MR. MOORE: (Cont'g.)

11 Q. Have you ever discussed the
12 claims in this case with Samuel Kessler?

13 A. No.

14 Q. Do you have any contact with
15 Samuel Kessler as -- as such as, have you had any
16 contact with Samuel Kessler since the events in this
17 lawsuit?

18 A. Yes, I -- he enrolled as a
19 member, again, when I rechartered the organization.
20 However, he -- he left shortly after.

21 Q. Did he leave because he
22 graduated, for some other reason?

23 A. He left because of -- he left
24 because --.

25 MR. SECHLER: I'm sorry. Objection as

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2 to form. Calls for speculation.

3 MR. MOORE: Okay. You can answer.

4 THE WITNESS: I cannot say that I'm
5 fully aware of what -- what -- what is one hundred
6 percent definitively the reason that he left.

7 BY MR. MOORE: (Cont'g.)

8 Q. Well, did he have any
9 communications with you as to why he left?

10 A. Not me personally, no.

11 Q. Did he have communications with
12 anyone else regarding why he left?

13 MR. SECHLER: Objection. Calls for
14 speculation.

15 THE WITNESS: I -- no, I -- I can't
16 say who exactly. I think -- just hearing it through
17 different people.

18 BY MR. MOORE: (Cont'g.)

19 Q. And what people did you hear it
20 from?

21 A. Multiple club members, so I can't
22 recall --

23 Q. Do you remember their names?

24 A. -- who exactly.

25 Q. You can't remember any of these

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2 club members' names?

3 A. I -- no, I'm saying like, I -- I
4 cannot recall who exactly told me that he was not
5 going to be coming back.

6 Q. And what did they tell you about
7 why he was not going to come back?

8 A. He did not want to deal with
9 anybody from club organizations such as the Young
10 Democratic Socialists of America.

11 Q. Okay. Why -- in the context of
12 the College Republicans, why would he have to deal
13 with the Young Democratic Socialists?

14 A. So the college progressives
15 morphed into that club, so he did not want to deal
16 with any attacks or essentially fearing for the
17 club's safety and his own safety just by simply
18 existing on campus.

19 Q. Okay. Do you have a current
20 address, phone number or email address for Samuel
21 Kessler?

22 A. No, I do not.

23 Q. Do you know what information
24 about the allegations and the complaint Samuel has?

25 A. I believe he was a witness in the

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2 Art Laffer event as well.

3 Q. Okay. And do you have social
4 media contact with Samuel Kessler?

5 A. I do not.

6 Q. Do you know the name Joe McCarty?

7 A. No, I do not.

8 Q. Are you aware of any other
9 witnesses to the tabling event, what we've called the
10 tabling event, of November 14th, 2019?

11 A. Other than John Restuccia, John
12 Lizak and Lacey Kestecher, I am not aware of any
13 other witnesses.

14 Q. And how about the Dr. Laffer
15 event, who are you -- are you aware of the identity
16 of any witnesses to the Dr. Laffer event of November
17 18th, 2019?

18 MR. SECHLER: And Mr. Moore, apart
19 from everybody you already mentioned, are you going
20 to go over that all again?

21 BY MR. MOORE: (Cont'g.)

22 Q. I'm -- what I'm asking about is,
23 anybody other than you've already told me about, are
24 you aware of any other witnesses to the Laffer event?

25 A. No, none that I know personally,

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2 no. Not that I --

3 Q. I'm not asking about your
4 personal relationship with them, I'm asking --.

5 A. I just -- like none that I could
6 provide names of like I'm aware of like -- like on
7 that day of other people who went, but I don't know
8 their names or any information about them.

9 Q. Okay. Going back to the caption,
10 which is up on the screen, do you have an
11 understanding of what Plaintiff Young America's
12 Foundation is?

13 A. Do I know who they are?

14 Q. Yes.

15 A. Yes, I do.

16 Q. Do you hold any kind of role,
17 position or membership in Young America's Foundation?

18 A. I do not.

19 Q. Did you have any contact or
20 communication with Young America's Foundation before
21 November 2019?

22 A. No.

23 Q. Did Young America's Foundation
24 have some kind of involvement with either the tabling
25 event or the Laffer event, if you know?

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2 A. I do not know.

3 Q. Do you know if the col -- B.U.

4 College Republicans had any involvement with Young

5 America's Foundation before the Laffer event?

6 A. I do not know.

7 Q. You were the vice president of

8 the organization, correct?

9 A. Yes.

10 Q. Did John Restuccia ever tell you

11 that Young America's Foundation had any involvement

12 in bringing Dr. Laffer to campus?

13 A. No. I -- I believe I only found

14 that out as of more recent.

15 Q. Okay. Do you know an individual

16 named Raj Kannappan?

17 A. No, I do not.

18 Q. Did you ever have any discussions

19 with Mr. Kannappan before the Laffer event, if you

20 know?

21 MR. SECHLER: Objection to form.

22 THE WITNESS: I don't know who that

23 is, so I don't know.

24 MR. MOORE: Okay. Fair enough.

25 BY MR. MOORE: (Cont'g.)

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2 Q. When did you become aware of that
3 Dr. Laffer was coming to campus?

4 A. I was told in August of 2019,
5 that we were going to host a big speaker. I was not
6 given the name until October, I believe.

7 Q. Okay. Did you have any
8 involvement in facilitating the speaker's appearance?

9 A. Other than promotion, no. That
10 was mostly John Restuccia.

11 Q. Okay. What involvement did you
12 have in promotion?

13 A. I promoted the event to the
14 economics department and the political science
15 department.

16 Q. How did you do that?

17 A. We made flyers and I gave it to
18 the -- both departments and I asked them to share it
19 throughout --.

20 Q. Do you have copies of those
21 flyers?

22 A. I do not have copies of those
23 flyers. They were physical flyers, so I don't have
24 them anymore.

25 Q. Was the room for the speaker's

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2 appearance selected?

3 A. When the flyers were made?

4 Q. At any time.

5 MR. SECHLER: Objection to form.

6 THE WITNESS: I don't understand the
7 question.

8 MR. MOORE: Okay. I'll try to clarify
9 it.

10 BY MR. MOORE: (Cont'g.)

11 Q. Were you made aware that the
12 speaker would be -- Dr. Laffer, were you aware that
13 Dr. Laffer would be speaking somewhere on campus?

14 A. Yes.

15 Q. And where were you made aware
16 that he would be speaking?

17 A. As far as I was concerned, I
18 believe that he was speaking in the basement, the
19 back -- the academic aid building. I believe it was
20 switched last minute though.

21 Q. Okay. So when you say the
22 basement, was he -- was a room reserved for his
23 speech prior to the speech?

24 A. A room was reserved prior.

25 Q. Okay. And how did the College

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2 Republicans select that room, if you know?

3 A. No, I do not know. That was John
4 Restuccia.

5 Q. Okay. So John Restuccia was
6 involved in reserving the room. Is that correct?

7 MR. SECHLER: Objection to form.

8 THE WITNESS: Yes, I think he only
9 reserved a room. He -- he did not expect many
10 people, so he reserved a small room on campus.

11 MR. MOORE: Okay.

12 BY MR. MOORE: (Cont'g.)

13 Q. Was approval from anyone required
14 to select that room?

15 MR. SECHLER: Objection.

16 THE WITNESS: I'm sure it was to be
17 there, yes. It has to be approved before.

18 BY MR. MOORE: (Cont'g.)

19 Q. But you had no involvement in --
20 in that process?

21 A. I did not, no.

22 Q. What is your general
23 understanding of the procedures required to secure a
24 room for a speaker or other event at Binghamton
25 University?

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2 A. It's not specific to a speaker
3 unless you are requesting certain rooms. For -- for
4 most rooms, you have to go on to B-There, you have to
5 check if the room is available. You can make the
6 request. Currently, right now, the head of B-There
7 is Catherine Ron.

8 So Catherine will receive the request
9 and she will approve it, typically, within a day,
10 perhaps up to maybe a week. That is how most rooms
11 are organized. Bigger rooms such as the ... require
12 special permission.

13 Q. Okay. Got you. And just to be
14 clear, you had no email contact with anyone from
15 Young America's Foundation to prepare for the Laffer
16 event?

17 A. No, I did not.

18 Q. Okay. I'm going to show you an
19 exhibit.

20 MR. MOORE: If we can put Exhibit Six
21 up on the screen?

22 BY MR. MOORE: (Cont'g.)

23 Q. And I'll ask you to -- to have a
24 look at that exhibit. If you need the stenographer
25 to scroll down. If you could take a moment and just

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2 read the exhibit before I ask any questions, I'd
3 appreciate it.

4 A. Okay.

5 MR. SECHLER: I would just ask the
6 court reporter to scroll down to the bottom just to
7 make sure that Ms. Bey can see the whole document. I
8 don't think Mr. Moore and Ms. Bey has the hard copy.

9 MR. MOORE: Okay. That's why I -- I
10 would just like her to look at it before we start
11 asking questions.

12 MR. SECHLER: Okay. Thank you very
13 much.

14 THE WITNESS: Okay. I can look at it.

15 BY MR. MOORE: (Cont'g.)

16 Q. Okay. We can scroll back up a
17 little to the top of the document. And you'll see
18 that this appears to be an -- an email titled
19 Binghamton University College Republicans. And other
20 than a forwarding email between Restuccia and Lizak
21 at the top of this document, it appears to be an
22 email from someone named Jeff Coghlan, C-O-G-H-L-A-N,
23 to undisclosed recipients. These are two emails
24 dated October 21 and 22, 2019. Would you agree with
25 me there, ma'am?

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2 A. Yes.

3 Q. Okay. Do you recognize this
4 email from Mr. Coghlan?

5 A. I do not know who Mr. Coghlan is.

6 Q. Okay. That was my next question.
7 You don't know who Mr. Coghlan is?

8 A. I don't.

9 Q. Do you remember him having any
10 involvement with the Binghamton University College
11 Republicans in 2019?

12 MR. SECHLER: Objection to form.

13 THE WITNESS: He did not. I
14 understand what the email is saying, but he did not.

15 BY MR. MOORE: (Cont'g.)

16 Q. And were you aware of any -- this
17 refers to number two, sort of halfway down the page,
18 it says, we will all be a part of the B.U. College
19 Republicans advisory board. As Vice President of the
20 College Republicans in fall of 2019, were you aware
21 that there was a B.U. College Republicans advisory
22 board?

23 A. So when he started the advisory
24 board, I -- I assume that he's simply referring to
25 the e-board. I do not know what else he would be

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2 referring to.

3 Q. Well, he says, we will all be
4 part of the B.U. College Republicans advisory board.
5 Our challenge will be to assist them in growing their
6 membership and developing their leaders. And then,
7 it goes on. Do you have any recollection of Mr.
8 Coghlan or anyone else being involved in the B.U.
9 Republicans?

10 A. Well, I apologize about that. I
11 thought that -- I thought that that was a part that
12 John Restuccia had written. Other than that, no. I
13 understand -- I -- I -- I -- I understood that who --
14 I didn't understand who was saying that part.

15 MR. SECHLER: And -- and Ms. Bey, let
16 me just caution you to make sure Mr. Moore gets his
17 question done for Monique's sake, because it's going
18 to be really hard for her to take this all down.

19 THE WITNESS: I apologize.

20 BY MR. MOORE: (Cont'g.)

21 Q. So just to repeat, Mr. Coghlan
22 writes on October 21, 2019, according to this email,
23 next to the number two, we will all be part of the
24 B.U. College Republicans advisory board. Our
25 challenge will be to assist them in growing their

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2 membership and developing their leaders.

3 And then, a little farther down, he
4 says, our introductory meeting will be held at the
5 Binghamton Club next Wednesday, October 30th, 2019,
6 at twelve o'clock. So my first question is, do you
7 remember Mr. Coghlan or anybody else being part of a
8 B.U. College Republicans advisory board?

9 A. No. The only dinner that we had
10 with anybody, and I believe it was in October, we had
11 a -- a dinner with the, I believe, President of the
12 SUNY Binghamton -- sorry, SUNY ... College
13 Republicans. But I don't re -- I don't recognize Mr.
14 Coghlan's name or the advisory board that he's
15 talking about in any sort of way.

16 Q. Okay. Do you know where the
17 meeting you did attend was held?

18 A. It was at Park Diner.

19 Q. I'm sorry?

20 A. It was at Park Diner.

21 Q. Okay. If we scroll up a little
22 on this, it's the top of the page, it says, Mr.
23 Coghlan sends another email that says, due to my lack
24 of planning, we will be changing the location of the
25 meeting next week, October 30th, 2019, to Little

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2 Venice. Ma'am, my question for you is, did you
3 attend a meeting at Little Venice on or about October
4 30th, 2019?

5 A. No, I did not.

6 Q. Okay. And then, a little farther
7 down in that email, it says -- under next to number
8 one, it says, from Mr. Coghlan, along with the Young
9 America's Foundation, we will be underwriting a
10 speaking engagement with Economist and Presidential
11 Medal of Freedom Winner Art Laffer. Dr. Laffer will
12 be speaking to and dining with the B.U. students on
13 November 18th. Did I read that correctly, ma'am?

14 A. Yes.

15 Q. Do you know how Mr. Coghlan and
16 whoever the addressees of this email were underwrote
17 the speaking of engagement of Dr. Laffer?

18 MR. SECHLER: Objection. Foundation.

19 THE WITNESS: I'm not even sure what
20 they mean by underwrite. And I do not know who Mr.
21 Coghlan is, so I can't answer that question. This is
22 simply something I was unaware of.

23 MR. MOORE: Okay. That's fine.

24 THE WITNESS: I assume that, perhaps,
25 they may have been donors, but I do not know.

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2 MR. MOORE: Okay. I just want to know
3 what you know.

4 BY MR. MOORE: (Cont'g.)

5 Q. It also says Dr. Laffer will be
6 speaking to and dining with the B.U. students on
7 November 18th. Were you present when Dr. Laffer
8 dined with B.U. students on November 18th?

9 A. I was not. What they're
10 referring to is the standard practice at least for
11 when a Republican club out typically invites someone
12 to campus, they all go out to dinner after typically
13 done on the e-board.

14 I was aware that this should have
15 happened, of course, it did not. And I believe that
16 they ended up going to Denny's, actually, not Little
17 Venice.

18 Q. Okay. There's been some
19 testimony in this case, which I know you weren't
20 present for, that some College Republican students
21 dined with Dr. Laffer before his speech. Were you
22 present for that?

23 MR. SECHLER: Objection.

24 THE WITNESS: (Overspeaking).

25 BY MR. MOORE: (Cont'g.)

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2 Q. Okay. Your attorney talked over
3 you, so can you answer the question again?

4 A. I -- I did not dine with him. I
5 was not made aware of this.

6 Q. Okay. Another thing I wanted to
7 ask you about would be --.

8 MR. MOORE: I'm done with Defendant's
9 Exhibit Six. Thank you, Monique. Monique, could you
10 put Exhibit Seven up on the screen? This is a short
11 email which we previously marked in an earlier
12 deposition as Defendant's Exhibit Seven. And I'll
13 state for the record that this is Bates stamped
14 twelve ninety-one from defendant's disclosures.

15 The previous email Exhibit Six was
16 Bates stamped one nineteen and one twenty from the
17 Plaintiff's disclosure. I didn't put that on the
18 record. I apologize. I'm going to ask if you could
19 look at this email, Ms. Bey?

20 And Monique, if you could scroll down
21 just a little so the whole thing can fit on the
22 screen for her. I think it's pretty short.

23 BY MR. MOORE: (Cont'g.)

24 Q. And Ms. Bey, when you've had a
25 chance to review the document, you can let me know

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2 and I'll ask you questions.

3 MR. SECHLER: And Ms. Bey, don't
4 hesitate to let us know if you -- if you're having
5 trouble reading it. It's kind of faint and we -- we
6 probably can enlarge it, if you need it.

7 THE WITNESS: Oh, I can -- I can zoom
8 up on the top, but it is all right.

9 MR. SECHLER: Oh, great.

10 MR. MOORE: Okay.

11 BY MR. MOORE: (Cont'g.)

12 Q. Have you ever seen this email
13 before today, ma'am?

14 A. I haven't, no.

15 Q. Okay. Do you know who Joe
16 Gallagher is, Joseph T. Gallagher?

17 A. I don't know.

18 Q. You have to speak up, I -- I
19 can't quite hear you.

20 A. Oh, I don't know who he is.

21 Q. Okay. You'll see he has an email
22 that is dated Friday, October 25th, 2019. And about
23 the middle of the page, and it says, John, I
24 understand that the Binghamton University College
25 Republicans will be holding a round table event in

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2 LH9 on October 28th.

3 Are you anticipating any issues or
4 attendance from the members of PLOT or their
5 associating student groups? Let me know when you can
6 and have a great weekend. Did I read that correctly,
7 ma'am?

8 A. Yes.

9 Q. And I think you have to speak up.
10 We can barely hear you here, okay?

11 A. I'm so sorry. I -- you did read
12 that correctly.

13 Q. Okay. Do you know what events he
14 is referring to here, the October 28th event?

15 A. I do not know what event he's
16 referring to. It sounds like that was a meeting that
17 day and I feel that most likely I would've attended.
18 I only missed, I believe, two meetings that semester.
19 But I do not remember a round table discussion of any
20 type.

21 Q. Okay. There's been some prior
22 testimony that indicated that this may have been
23 titled, The Case Against Socialism. Do you remember
24 that event?

25 A. I do remember that, yes.

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2 Q. Were you present for that event?

3 A. I believe I was.

4 Q. Did you ever meet with Officer
5 Gallagher before that event?

6 A. I did not.

7 Q. But that event did occur?

8 A. I believe so, yes.

9 Q. And what occurred at the event,
10 if you recall?

11 A. I believe it was conducted as a
12 general body meeting, so nothing particularly
13 different from any meeting.

14 Q. Okay. Were any university or
15 university police representatives present, if you
16 know?

17 A. Not that I can recall.

18 Q. Okay. In Investigator
19 Gallagher's email, do you see that it refers to PLOT
20 and associated student groups. Do you see that?

21 A. I do.

22 Q. And do you know what PLOT is?

23 A. I do.

24 Q. What is PLOT?

25 A. I believe that they are the

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2 Progressive Leaders of Tomorrow. It's a local
3 section of an anti-fascist group that works to spread
4 left-leaning politics.

5 Q. Do you have any knowledge of who
6 any of the members are?

7 A. No, I do not.

8 Q. Do you know what associated
9 student groups are referred to there?

10 MR. SECHLER: Objection to form.

11 THE WITNESS: I think when they say
12 associated student groups, I think they could just
13 mean a political lean.

14 BY MR. MOORE: (Cont'g.)

15 Q. You think what? I'm sorry, we
16 couldn't hear you there.

17 A. When they speak about associated
18 groups, I think that they are just referring to
19 associated political leaning.

20 Q. Okay. But do you know what
21 particular student groups are referred to in that
22 sentence?

23 A. Yes.

24 MR. SECHLER: Object. Objection to
25 form.

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2 THE WITNESS: I imagine that they're
3 referring to college progressives. Perhaps, women's
4 student union. Like, as I said, when I -- when I --
5 when they say associated groups, I believe that they
6 simply mean groups on campus who also have similar
7 politics.

8 MR. MOORE: Okay. Got you.

9 BY MR. MOORE: (Cont'g.)

10 Q. Do you have any personal
11 knowledge regarding whether Defendant Brian Rose had
12 any direct contact or communication with any
13 representative of PLOT or associated student groups
14 during the calendar year 2019 up to and including the
15 tabling event and Laffer event?

16 A. Not -- not to my knowledge, no.

17 Q. Okay. Do you have any personal
18 knowledge regarding whether Defendant Harvey Stenger
19 had any direct contact or communication with any
20 representative of PLOT or associated student groups
21 during the calendar year 2019 up to and including the
22 tabling event and Laffer event?

23 A. Not to my knowledge, no.

24 Q. Okay. Same question as to John
25 Pelletier, do you have any personal knowledge that

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2 defen -- whether Defendant John Pelletier had any
3 direct contact or communication with any
4 representative of PLOT or any associated student
5 group during the calendar year 2019 up to and
6 including the tabling event and Laffer event?

7 A. I'm actually not aware of who
8 Pelletier is, so I can't answer that.

9 Q. Okay. That's fair enough. Let's
10 go back to Exhibit One, which is the complaint in
11 this matter.

12 MR. MOORE: And I'm going to ask,
13 Monique, if you could go to paragraphs forty-seven
14 and forty-eight, please?

15 BY MR. MOORE: (Cont'g.)

16 Q. That's located at the bottom of
17 page twelve and the top of page thirteen of the
18 complaint. And if you want to take your time and
19 read that. I'll read it into the record.

20 Paragraph forty-seven of Exhibit One
21 reads, on Thursday, November 14th, 2019, College
22 Republicans organized a tabling event in a high
23 traffic area of SUNY Binghamton's campus known as the
24 Spine. College Republicans' table was not blocking
25 access to buildings or pedestrian traffic.

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2 And then, paragraph forty-eight at the
3 top of page thirteen of Exhibit One reads, as they
4 and many other student organizations had done
5 previously, College Republicans did not obtain a
6 permit from Student Association to table on this
7 date.

8 Did I read that correctly, ma'am?

9 A. You did, yes.

10 Q. Okay. Where was this tabling
11 event held, if you know?

12 A. I believe it was held on the
13 Spine that day, yes.

14 Q. Okay. Next question, what is the
15 Spine?

16 A. The Spine is a curved sidewalk in
17 front of the I.T.S. building and -- in front of the
18 I.T.S. building and finance building on campus.

19 Q. Okay. Got you. And if you know,
20 what time did that table get set up?

21 A. I do not know. I believe it was
22 in the morning.

23 Q. Okay. Were you personally
24 present for any of this tabling event?

25 A. I was not.

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2 Q. You were not there at any point
3 during the event?

4 A. I saw the table while walking to
5 classes, but I did not stop by the table.

6 Q. Okay. Did you see what was --
7 how many tables -- table or tables were there?

8 A. I believe there were one -- I
9 believe that there was one.

10 Q. Okay. Were there any tables next
11 to the College Republicans' table?

12 A. As far as I could see, there was
13 another table or either a shared table with Turning
14 Point, yes.

15 Q. And what -- what is Turning
16 Point?

17 A. I'm sorry. I'm so sorry about
18 that.

19 MR. SECHLER: Okay.

20 THE WITNESS: Can you repeat the
21 question?

22 BY MR. MOORE: (Cont'g.)

23 Q. Well, let -- let's strike that
24 question and -- and I'm referring now to paragraph
25 forty-eight. And I'll read that again into the

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2 record. It says, as they and many other student
3 organizations had done previously, College
4 Republicans did not obtain a permit from the Student
5 Association to table on this date.

6 Were you aware of the process of
7 obtaining a permit for tabling on the Spine?

8 A. At the moment, I was not aware of
9 the -- of the process of -- of obtaining a permit,
10 but I was aware that John Restuccia had applied for a
11 permit.

12 Q. Okay. So is it your
13 understanding that John Restuccia tried to get a
14 permit for the tabling event on the Spine?

15 A. He did. Yes, he made me aware of
16 that.

17 Q. Okay. It says here, College
18 Republicans did not obtain a permit from the Student
19 Association to table on this date. Is that
20 inaccurate?

21 MR. SECHLER: Objection. Foundation.

22 THE WITNESS: I -- it -- it -- I
23 believe that it is accurate. Just because he applied
24 does not mean that he received one.

25 MR. MOORE: Okay.

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2 BY MR. MOORE: (Cont'g.)

3 Q. But Mr. Restuccia would know

4 that, correct?

5 A. Yes, Restuccia would know that.

6 Q. Do you have any personal

7 knowledge, as you sit here today, whether Mr.

8 Restuccia attempted to get a permit on the Spine for

9 that day?

10 A. On the Spine.

11 Q. I -- I can't hear you. You have

12 to speak up, please.

13 A. He did tell me that he attempted

14 to get a permit.

15 Q. Okay. I know he told you that,

16 but do you have any personal knowledge whether he

17 actually did so?

18 MR. SECHLER: Objection to form.

19 THE WITNESS: Oh, I -- I do not know,

20 no. Not in that case, no.

21 MR. MOORE: All right.

22 BY MR. MOORE: (Cont'g.)

23 Q. You were familiar with the B-

24 There system, correct?

25 A. I am, yes.

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2 Q. And you testified earlier that
3 the College Republicans had utilized this to reserve
4 the room for Dr. Laffer, correct?

5 A. I do not know.

6 Q. Okay. All right. Referring back
7 to this paragraph, when had the College Republicans
8 tabled on the Spine without a reservation before
9 November 14th, 2019?

10 MR. SECHLER: Objection. Foundation.

11 THE WITNESS: I couldn't answer that
12 because I was not -- as I mentioned earlier, I was
13 not involved in tabling prior to that other than ...

14 MR. MOORE: Okay.

15 BY MR. MOORE: (Cont'g.)

16 Q. So is the answer, you don't know
17 of any occasions before November 14th, 2019, when the
18 College Republicans tabled without a permit?

19 MR. SECHLER: Mr. Moore, objection.
20 That misstates what she just said.

21 MR. MOORE: Trying to clarify.

22 MR. SECHLER: Objection to the
23 question.

24 MR. MOORE: Well, you can object all
25 you want.

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2 BY MR. MOORE: (Cont'g.)

3 Q. Did you understand the question,
4 ma'am?

5 A. I believe I did. I do not know
6 because I was not -- I did not table, so I would not
7 know.

8 Q. Okay. All right. So my
9 question, what your attorney interrupted was, are you
10 -- is it fair to say, you are not aware of any other
11 incidents where the College Republicans tabled at
12 Binghamton University without a permit before
13 November 14th, 2019?

14 MR. SECHLER: And Mr. Moore,
15 objection. You -- you just said I interrupted your
16 question. I did not. I plainly waited for you to
17 finish your question before I stated my objection. I
18 object to this question too.

19 MR. MOORE: Okay.

20 MR. SECHLER: You can answer.

21 THE WITNESS: Not to my knowledge, no.

22 MR. SECHLER: Thank you.

23 BY MR. MOORE: (Cont'g.)

24 Q. Do you know who was working the
25 tables at the Spine on November 14th, 2019?

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2 A. I believe John Restuccia, Lacey
3 Kestecher -- no, technically, for our club, just John
4 Restuccia. I was not able to attend that day, but I
5 was busy.

6 Q. Okay. Got you. You said you
7 passed by the table at some point that morning?

8 A. Yes.

9 Q. Do you know what time that
10 occurred?

11 A. I can't recall.

12 Q. Okay. Was there any kind of
13 protest going on at the time you passed by the table?

14 A. No.

15 Q. And can you describe what, if
16 anything, was displayed at the College Republicans'
17 table?

18 A. At the College Republicans' table
19 there was a yellow tablecloth with hot chocolate and
20 the -- the small flyers I referred to earlier that I
21 was using for promotion.

22 Q. Okay. And what flyers -- were
23 those flyers for the Dr. Laffer event?

24 A. They were, yes.

25 Q. How many flyers were prepared for

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2 the tabling event?

3 A. I don't know.

4 Q. Do you know how many flyers were
5 handed out for the Laffer event at the tabling event?

6 A. I don't know.

7 Q. And you said there was another
8 table set up at the proximity of the College
9 Republicans' table by, you said, Turning Point?

10 MR. SECHLER: Objection to form.

11 MR. MOORE: Well, I'm try to clarify
12 that is what she said.

13 MR. SECHLER: Well, why don't you just
14 ask her a question and not try and restate the
15 testimony so that we get a clear record.

16 MR. MOORE: I'm trying to get a clear
17 record, Phil.

18 BY MR. MOORE: (Cont'g.)

19 Q. You mentioned a group named
20 Turning Point earlier in your testimony, ma'am. Do
21 you recall that?

22 A. Yes.

23 Q. What is Turning Point?

24 MR. SECHLER: Objection. Foundation.

25 THE WITNESS: Turning Point is a

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2 conservative organization. That's all I'm really
3 aware of.

4 BY MR. MOORE: (Cont'g.)

5 Q. Are they a stu -- a -- a student
6 group sanctioned by the S.A. at Binghamton
7 University?

8 MR. SECHLER: Objection, foundation.

9 THE WITNESS: They're not a student
10 group sanctioned by the S.A.

11 MR. MOORE: Okay.

12 BY MR. MOORE: (Cont'g.)

13 Q. Do you know whether anybody from
14 the organization Turning Point U.S.A. was at the
15 tabling event on November 14th, 2019?

16 A. Lacey Kestecher and John Li --
17 Lizak, yes.

18 Q. Okay. And those individuals were
19 also members of the College Republicans, correct?

20 A. Yes.

21 Q. All right. Were there any other
22 people there other than John Restuccia, John Lizak
23 and Lacey Kestecher, that you are aware of?

24 A. That no -- not that I'm aware of,
25 no.

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2 Q. Okay. And do you know if the
3 College Republicans coordinated the tabling event
4 with Turning Point U.S.A. before November 14th, 2019?

5 A. I would not know.

6 Q. Okay. As Vice President, no one
7 kept you up to date on that?

8 A. As far as I was concerned, John
9 had asked me if I could table with him. I'm so
10 sorry. If I can table with him, I told him I was not
11 able to. And he said that he would ask somebody else
12 for assistance for setting up the table that day.
13 That is all I was made aware of.

14 Q. Okay. Were you involved in any
15 other conversations other than the conversation you
16 referred to with John about the tabling event before
17 the tabling event?

18 A. No. And I believe it was almost
19 at the same week.

20 Q. Did you discuss the tabling event
21 with Lacey before the tabling event?

22 A. No.

23 Q. The answer's no?

24 A. Oh, no. Yeah, the answer's no.

25 Q. How far away from the College

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2 Republicans' table was the Turning Point table
3 located, if you know?

4 MR. SECHLER: Objection to form.

5 THE WITNESS: I don't know.

6 MR. MOORE: Okay.

7 BY MR. MOORE: (Cont'g.)

8 Q. You passed by and looked at it
9 that day and you gave me a description of the College
10 Republicans' table, correct?

11 A. Yes.

12 Q. What was at the Turning Point
13 table, if you know?

14 MR. SECHLER: Objection to form.

15 THE WITNESS: I think Lacey was there,
16 but I was not paying attention to the Turning Point
17 table.

18 MR. MOORE: Okay.

19 BY MR. MOORE: (Cont'g.)

20 Q. So you don't know what was
21 displayed there?

22 A. No, I don't.

23 MR. MOORE: Okay. Let's look at
24 Exhibit Seventeen, which is a photograph. And this
25 was previously marked at prior depositions.

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2 THE WITNESS: If -- if nobody minds,

3 I'm ... break at twelve thirty by any chance?

4 MR. MOORE: I -- I'm sorry, I didn't
5 hear you.

6 THE WITNESS: If nobody would mind,
7 can we call for a break at twelve thirty?

8 MR. MOORE: Absolutely. Sure thing.

9 THE WITNESS: Thank you.

10 BY MR. MOORE: (Cont'g.)

11 Q. And have a look at that photo,
12 ma'am. Do you recognize that photo?

13 A. I actually don't, no.

14 Q. Okay. Do you recognize what's
15 depicted in that table -- rather that photo, do you
16 see a table there?

17 A. I can tell that that's Lacey in
18 the red hat. I don't know who the other person is.
19 It kind of looks like John Lizak, but I cannot tell.

20 Q. Okay. You see there's a table
21 there that these two individuals are standing behind?

22 A. Yes.

23 Q. And there's a sign that says, I'm
24 pro-choice, pick your gun and there's a picture of
25 three guns. Do you see that?

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2 A. I do.

3 Q. Did you see that sign on November
4 14th, 2019?

5 A. As I mentioned, I was not paying
6 attention to the second table, so I do not know.

7 Q. Okay. And next to it, there
8 appears to be another table on the right side of the
9 photo, correct?

10 A. I can see it. Yes, I can kind of
11 see it.

12 Q. You can only see a small part of
13 it, would you agree?

14 A. Yes.

15 Q. And there appears to be a
16 cardboard cutout of what appears to be former
17 President Trump. Is that correct?

18 A. Yes.

19 Q. Was that displayed at the College
20 Republicans table?

21 A. I cannot recall.

22 Q. Okay. Is that table on the right
23 side of the photo, the College Republicans table?

24 A. It looks to have the -- the
25 yellow tablecloth I was referring to, so yes, I

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2 believe so.

3 Q. Okay. Got you. All right.
4 Let's go to paragraph fifty of the complaint. Well,
5 I -- I might be able to save time on this. You were
6 not present when any protest occurred at the -- at
7 the November 14th tabling event?

8 A. I was not.

9 Q. Did you ever become aware of the
10 protest?

11 A. Yes, I was. I did become aware
12 of it shortly after they happened.

13 Q. Okay. And how were you made
14 aware of the -- the event?

15 A. Through John Restuccia.

16 Q. Okay. Had the tabling event
17 concluded at the time he told you about it?

18 A. Yes.

19 Q. Okay. And were you present at
20 any point at the tabling event while the Binghamton
21 University police officers were present?

22 A. I was not.

23 Q. And is it fair to say, you didn't
24 hear any communications between those police officers
25 and anybody else at the scene on November 14th, 2019?

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2 A. I didn't.

3 Q. Do you know Brian Rose by sight,
4 the defendant in this case?

5 A. By sight?

6 Q. Would you know him if you saw
7 him?

8 A. I've seen a few pictures of him,
9 so perhaps.

10 Q. Have you ever met him before
11 today?

12 A. No, I have not met him.

13 Q. And do you know if he was present
14 at the November 14th, 2019, tabling event?

15 A. No, I do not know.

16 Q. Do you know the B.U. President,
17 Harvey Stenger, who's also a defendant in this case?

18 A. Yes, I do know who he is.

19 Q. Have you met him before today?

20 A. I've seen him in person, but I
21 have never met him personally.

22 Q. Okay. Do you know if he was
23 present at the November 2019 tabling event?

24 A. I do not.

25 Q. And you've already testified that

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2 you don't know John Pelletier?

3 A. I don't know who he is.

4 Q. And is it also fair to say, you

5 wouldn't know whether or not he was located --

6 whether he was present at the November 14th, 2019,

7 tabling event?

8 A. That's fair to say.

9 Q. Okay. All right. Trying to save
10 you some time here. Before we break at twelve

11 thirty, let's have a look at Defendant's Exhibit

12 Twelve. And this is a little hard to see on the

13 screen, so if you need our stenographer to make it

14 bigger, we can do that.

15 A. That's okay. I recognize it
16 actually.

17 Q. Okay. Fair enough. So you do

18 recognize this statement, which appears to be a

19 Facebook post with the title Binghamton University

20 College Republicans Official statement by B.U.C.R.

21 President John Restuccia regarding November 14th

22 incident. Do you see that?

23 A. I see --

24 Q. This refer --.

25 A. -- it and recognize it.

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2 Q. I'm sorry?

3 A. I see it and I recognize it.

4 Q. Okay. When's the first time you
5 saw this statement?

6 A. Before it was posted to the
7 internet.

8 Q. I'm sorry I can't hear you,
9 ma'am.

10 A. Before it was posted to the
11 internet.

12 Q. Okay. Did you have any input
13 into drafting this statement?

14 A. He asked me what I -- John
15 Restuccia asked me what I thought of it.

16 Q. Okay. And what did you tell him?

17 A. I thought it looked good.

18 Q. Okay. Did you make any changes
19 to it?

20 A. I didn't. I don't believe so at
21 the moment.

22 Q. And is it a fair statement that
23 John -- as far as you know, John Restuccia authored
24 this statement?

25 A. Yes.

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2 Q. Do you know if anybody else other
3 than you had input into the statement's content?

4 A. No, I'm not aware of anyone else.

5 Q. Okay. Are you aware of a
6 statement authored by Defendant Brian Rose, following
7 the tabling event?

8 A. Yes, I am. It was ...

9 Q. Okay.

10 MR. SECHLER: I'm sorry, Mr. Moore.
11 You -- Ms. Bey was in the middle of an answer. Ms.
12 Bey, continue.

13 THE WITNESS: Oh. I believe that
14 you're referring to an email that he had sent out
15 after the -- after the Art Laffer event about it. I
16 believe also after the tabling event, I received both
17 emails because they were school-wide emails.

18 MR. MOORE: Okay. Got you.

19 BY MR. MOORE: (Cont'g.)

20 Q. All right. Well, let's go to
21 Exhibit Nineteen, which is Brian Rose's statement
22 about the tabling event. And I'm going to direct
23 your attention to the third paragraph of that
24 statement.

25 A. Sure.

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2 Q. And I'll read it into the record.

3 The College Republicans and organization chartered by
4 the Student Association, S.A., was joined by another
5 group known as Turning Point that by its own choice
6 was not chartered by the S.A. or otherwise recognized
7 by the University. Is -- is that statement accurate,
8 ma'am?

9 MR. SECHLER: Objection.

10 THE WITNESS: (Overspeaking)

11 MR. SECHLER: I'm sorry, Ms. Bey. I
12 may have objections. And -- and if you could just
13 pause for a moment after the question just so I can
14 give an objection, that would be awesome. Thank you.

15 THE WITNESS: Sure. Sorry.

16 MR. MOORE: I didn't hear your answer.

17 THE WITNESS: That is accurate, yes.

18 MR. MOORE: Okay. Thank you.

19 BY MR. MOORE: (Cont'g.)

20 Q. The next sentence says,
21 representatives of the two groups set up tables
22 outside the union in a reservable space without
23 having followed procedures to properly secure use of
24 the space. Did I read that correctly, ma'am?

25 A. You did read it correctly.

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2 Q. Do you know if the two groups
3 followed procedures to properly secure use of the
4 space?

5 MR. SECHLER: Objection. Foundation.

6 THE WITNESS: As for Turning Point
7 being that they were not a chartered organization, I
8 believe it's safe to assume that they didn't. And as
9 I had mentioned I -- and I was under the impression
10 that we had, and it turned out that we hadn't secured
11 a permit to table. But as also mentioned earlier, it
12 is extremely common practice for S.A. chartered
13 organizations to table without a permit.

14 BY MR. MOORE: (Cont'g.)

15 Q. Okay. Well, I don't think you
16 mentioned that before. How do you know it's
17 extremely common practice for S.A. chartered
18 organizations to table without a permit?

19 A. I ... ask not whether I ... if I
20 -- if I go around and I stop at tables that are on
21 the Spine or at the Peace Quad randomly and I ask
22 them -- I've asked, how do you get a table date.
23 Simply responded to me that we just set up.

24 So -- and -- and as I mentioned, I was
25 not aware of the B-There system at the moment. So I

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2 wasn't even aware how to get a table, but I do know
3 that a lot of organizations set up without a permit.

4 Q. Okay. Do you have any personal
5 or -- personal knowledge of any organizations setting
6 up a table on the Spine without a permit before
7 November 2019?

8 A. I cannot name specific
9 organizations, no.

10 Q. Can you give me details of any
11 organizations who have set up a table on the Spine
12 without a permit after November 2019?

13 A. After, no. Being that it was
14 winter, tables typically do not set up at that time,
15 so.

16 Q. Okay. Well, that was a broad
17 question I was asking. Following November 2019, up
18 until the present date, are you aware of any
19 organizations that have tabled on the Spine without a
20 permit?

21 A. With winter and with the
22 pandemic, and then restrictions, it hadn't -- tabling
23 has not really come back until as of very recent and
24 I believe that they are very strict about tabling
25 with permits now.

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2 Q. Okay. So is the answer to your
3 question, no, you don't know of any other
4 organizations after November 14th, 2019, that have
5 tabled on the Spine without a permit?

6 MR. SECHLER: Objection to form.

7 MR. MOORE: You can answer.

8 THE WITNESS: Actually, I do. Now
9 that I think about it. There is an organization
10 currently petitioning to bring electric scooters on
11 campus. They're not an S.A. chartered organization.
12 And they -- they are tabling. They do actually table
13 -- they were tabling quite frequently last semester.
14 So I do know of an incident where an organization was
15 tabling without a permit.

16 BY MR. MOORE: (Cont'g.)

17 Q. What's the name of that
18 organization?

19 A. I do not know of the name of the
20 organization. All I know is that they were -- in
21 order to bring electric scooters on campus that they
22 were giving out Krispy Kreme Donuts.

23 Q. Okay. And do you have personal
24 knowledge whether or not they attempted to table --
25 attempted to get a permit for that tabling?

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2 A. No. But being that you need to
3 be a club on campus in order to get a table, it's
4 safe to assume that they could -- they did it without
5 a permit.

6 Q. Well, what I'm asking is --.

7 A. ...

8 Q. Okay. You do not have personal
9 knowledge. And are you aware of any chartered
10 student groups who did a tabling on the Spine either
11 before or after November 14th, 2019, without a permit
12 other than the College Republicans?

13 A. Huh-uh.

14 Q. Okay. The next sentence in
15 Exhibit Nineteen says, representatives of the union
16 professional staff and of the S.A. notified the
17 tabling students that they were tabling without a
18 reservation in a space that had to be reserved in
19 advance and asked them to relocate. The groups
20 refused twice to move. Did I read that correctly,
21 ma'am?

22 A. Yes, you did.

23 Q. Were you present when this
24 occurred?

25 A. I was not.

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2 MR. SECHLER: Objection to form.

3 BY MR. MOORE: (Cont'g.)

4 Q. Do you have any knowledge of
5 whether or not this occurred?

6 MR. SECHLER: Same objection.

7 THE WITNESS: I don't have any
8 knowledge of this occurring.

9 BY MR. MOORE: (Cont'g.)

10 Q. Okay. And then, the next
11 sentence says, the group's display included
12 provocative posters with gun imagery. This being the
13 same day as the Saugus High School shooting. My
14 question is, did T.P.U.S.A.'s table include posters
15 with gun imagery, if you know?

16 MR. SECHLER: Objection. Asked and
17 answered.

18 MR. MOORE: You can answer, ma'am.

19 THE WITNESS: I do not personally
20 know. But from the photo that you showed, it does
21 seem to be -- to appear that way.

22 MR. MOORE: Okay.

23 BY MR. MOORE: (Cont'g.)

24 Q. Was there a school shooting the
25 same day?

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2 A. I was made aware afterwards, yes.

3 Q. Okay. Got you. Did you attend
4 the Arthur Laffer event?

5 A. I attempted to, yes.

6 Q. Okay. It's twelve thirty now,
7 you had said you wanted to take a break?

8 A. Yes.

9 MR. MOORE: Okay. Phil, Thom, where -
10 - do you want a break for lunch now?

11 (Off the record; 12:30 a.m.)

12 (On the record; 12:46 p.m.)

13 THE REPORTER: We're on the record.

14 BY MR. MOORE: (Cont'g.)

15 Q. Ms. Bey, are you ready to
16 proceed? Okay. We're back on the record. You
17 understand you're still under oath, ma'am?

18 A. I understand.

19 Q. Okay. I can't quite hear you.
20 If you can speak up. We need to hear everything you
21 said.

22 A. I understand.

23 Q. We're still not getting what
24 you're saying.

25 A. I do.

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2 Q. Okay. I hear you now. I am
3 going to direct your attention back to the complaint
4 which is Exhibit One. I'm now going to page
5 nineteen, paragraph seventy-seven.

6 MR. MOORE: And if I can ask Monique
7 to put it up on the screen for you.

8 BY MR. MOORE: (Cont'g.)

9 Q. And I will read paragraph
10 seventy-seven into the record. It says on the day of
11 the Dr. Laffer event, it's Monday, November 18th,
12 2019. Plaintiffs Y.A.F. and College Republicans met
13 with U.P.D. and certain SUNY Binghamton
14 Administrators acting at the direction of defendants
15 Stenger, Rose and Pelletier. Did I read that
16 correctly, ma'am?

17 A. You did, yes.

18 Q. Were you present at this meeting?

19 A. I was not present at this
20 meeting. No.

21 Q. Okay. And let's move on to
22 paragraph eighty-nine of the complaint which is at
23 page twenty. And paragraph eighty-nine reads a few
24 hours before the Dr. Laffer events, Dr. Laffer and
25 his aides arrived at a nearby airport.

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2 And I'll read paragraph ninety in as
3 well, that says, Y.A.F. was not the only party there
4 to greet them. However, as two officers from U.P.D.
5 arrived and intersected Dr. Laffer. Did I read those
6 paragraphs correctly, ma'am? Did you hear my
7 question?

8 A. Oh, I hear it. I'm so sorry.
9 You did read those correctly.

10 Q. Okay. Were you present for the
11 airport meeting described in the complaint?

12 A. No. I had class at the time.

13 MR. SECHLER: Just a -- let me just
14 point out that I think your microphone is not -- all
15 that effective when you're further away from your
16 device. So the closer you are, I think the better
17 chance we have of the court reporter picking you up.

18 THE WITNESS: That was read correctly
19 and -- no, I was not present. I was busy.

20 BY MR. MOORE: (Cont'g.)

21 Q. Okay. Paragraph ninety-four of
22 the complaint, a couple paragraphs down. It reads
23 approximately one hour before the Dr. Laffer event,
24 the two Pinkerton agents hired by Y.A.F. met with
25 U.P.D. Were you present at this meeting, ma'am?

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2 A. I was not.

3 Q. Okay. Let's go to paragraph

4 ninety-seven of the complaint. It's on the screen,

5 ma'am. It reads as follows. Ninety-seven from

6 Exhibit One. U.P.D. was so convinced of inevitable

7 disruption that it also had formed Y.A.F. donor and

8 Dr. Laffer's driver for the day, Geffery Kotlin.

9 They should stay with the vehicle

10 since Dr. Laffer may need to made a quick getaway if

11 the event was effectively cancelled by the

12 disruptors. Did I read that correctly, ma'am?

13 A. You did read that correctly.

14 Yes.

15 Q. Were you there when this

16 occurred, ma'am?

17 A. I wasn't.

18 Q. I didn't hear you.

19 A. I was not.

20 Q. Okay. Got you. Okay. We're

21 going to the next page, which is page twenty-two of

22 Exhibit One. And I'm going to direct your attention

23 to paragraphs ninety-eight and ninety-nine of the

24 complaint and I will read those into the record.

25 Ninety-eight, at least one hour before

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2 the Dr. Laffer event was scheduled to begin, College
3 Progressives and PLOT entered co-conspirators when
4 lined up outside the lecture hall and packed into the
5 adjacent lecture hall provided to College
6 Progressives by SUNY Binghamton Administrators.

7 Ninety-nine, once the doors to the Dr.
8 Laffer event were opened, hundreds of students and
9 non-students, many of them members of College
10 Progressives and PLOT, flooded in and packed the
11 room. Did I read those paragraphs correctly, ma'am?

12 A. You read that correctly, yes.

13 Q. Okay. I'm having trouble hearing
14 you. So if you could try to keep your voice up for
15 the stenographer, we would appreciate it. Were you
16 present when this occurred, ma'am?

17 A. No. I arrived very shortly
18 after.

19 Q. Okay. Were you present for any
20 meetings between College Republicans and the U.P.D.
21 before the Laffer event commenced?

22 A. I was not.

23 Q. Were you present for any meetings
24 or discussions between College Republicans and any
25 SUNY Binghamton employees or administration before

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2 the Dr. Laffer event commenced?

3 A. No.

4 Q. Do you have any personal
5 knowledge as indicated in paragraph ninety-nine
6 whether the individuals who entered the room were
7 members of College Progressives and/or PLOT?

8 A. No.

9 Q. Okay. Do you know -- did you
10 know any of the College Progressives members
11 personally?

12 A. I did not.

13 Q. Do you know any of the PLOT
14 members personally or did you in November 2019?

15 A. I did not.

16 Q. Did you observe any individuals
17 in the crowd at the Dr. Laffer event wearing masks on
18 November 18th, 2019?

19 A. Yes. Many of them wear.

20 Q. Okay. How many?

21 A. Technically, I was outside of the
22 door so I was with the protesters outside. Almost
23 all of them were black-clad and wearing mask ... into
24 the room, I would say over half were wearing masks.

25 Q. So is it your testimony -- your

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2 sworn testimony as you sit here today that over half
3 of the people present in the room at the Dr. Laffer
4 event were wearing black and wearing masks?

5 MR. SECHLER: Objection. Misstates
6 testimony.

7 MR. MOORE: I'm trying to clarify,
8 sir.

9 BY MR. MOORE: (Cont'g.)

10 Q. Did you understand the question,
11 ma'am?

12 A. Can you rephrase it?

13 Q. Okay. Is it your testimony that
14 over half of the persons present in the room at the
15 Dr. Laffer event were wearing black?

16 A. At the time that I was there,
17 yes.

18 Q. Okay. Is it your testimony that
19 at the time you were present at the Dr. Laffer event,
20 over half of the individuals present were wearing
21 masks? I didn't hear your answer, ma'am.

22 A. Yes.

23 Q. Okay. When were you present at
24 the Dr. Laffer event? When did you arrive?

25 A. I arrived when -- I believe a few

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2 minutes before he started talking. The doors were
3 already shut. But there were protestors outside. I
4 was not aware that --.

5 Q. And you were not what? I didn't
6 hear your answer.

7 A. I was not aware that the room was
8 changed.

9 Q. Okay. Were you --?

10 MR. SECHLER: Mr. Moore, let me just
11 ask the witness to stay a little closer to her
12 microphone. Because Ms. Bey, I just want to make
13 sure that your answers are being recorded in full.
14 And it's a little choppy from our end because I think
15 the microphone that you're using needs you to be
16 close to it.

17 THE WITNESS: Yeah. I'm trying to
18 speak directly into it. I don't know if it's
19 helping.

20 MR. SECHLER: Okay. Thanks.

21 BY MR. MOORE: (Cont'g.)

22 Q. Okay. Let me ask this. Were you
23 at the Dr. Laffer event in the lecture hall?

24 A. No. Not while he was there.
25 They let me after they --.

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2 Q. Okay. So when Dr. Laffer was in
3 the room, in the lecture hall in which he was
4 supposed to speak, were you present at all?

5 A. I was not. No.

6 Q. Okay. So when the events that
7 occurred that are described in paragraphs ninety-
8 eight and ninety-nine occurred which described people
9 entering the room an hour before the Dr. Laffer
10 event, you were not present for any of this, correct?

11 A. I was not.

12 Q. Okay. Do you know who was
13 present at the Dr. Laffer event from the College
14 Republicans group?

15 MR. SECHLER: Objection. Asked and
16 answered.

17 MR. MOORE: Well, I don't know if I
18 have the full list. So we're going to go through it
19 again, Philip.

20 MR. SECHLER: No, this is the third
21 time, Mr. Moore, you've done this.

22 MR. MOORE: It's not the third time,
23 but go ahead. You've made your objection.

24 THE WITNESS: It's everyone that
25 you've mentioned so far and so John Restuccia, Lacey

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2 Kestecher, Jon Lizak, oh, Blakeslee.

3 BY MR. MOORE: (Cont'g.)

4 Q. What was the name after Lizak?

5 Logan?

6 A. Yeah. Logan. Yeah. As far as I
7 was concerned, they were at the event.

8 Q. Okay. Do you know anyone else
9 personally that you have told -- haven't told me
10 about today who was present at the Laffer event?

11 A. I think perhaps Kevin Mora -- no,
12 no.

13 Q. Okay. So let's go to paragraph
14 one zero four. And I'll read it into the record. At
15 the insistence of College Republicans and Y.A.F.,
16 U.P.D. made one statement about the size of the crowd
17 and SUNY Binghamton's fire code and asked those
18 standing to take her seats. Did I read that
19 correctly, ma'am?

20 A. You did.

21 Q. Were you present when this
22 occurred?

23 A. I -- I believe I -- when I was
24 standing outside of the door, I did hear speaking,
25 but I was not sure who.

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2 Q. Okay. Got you. Were the doors
3 closed when you were standing outside the doors?

4 A. Yes. PLOT protestors were
5 blocking the doors.

6 Q. Okay. Let's go down to
7 paragraphs one zero eight, and one zero nine of the
8 complaint.

9 MR. SECHLER: Mr. Moore, let me just
10 ask for the court reporter to read back the answer.
11 I just want to make sure -- I'm having a hard time
12 hearing the witness. I'm not sure if it's ... right
13 speaker.

14 Madam court reporter, could you read
15 back the last answer just to make sure you got the
16 whole thing?

17 THE REPORTER: Yes. Give me one
18 moment.

19 (Reporter complied with request)

20 (Off the record; 01:06 p.m.)

21 (On the record, 01:08 p.m.)

22 BY MR. MOORE: (Cont'g)

23 Q. The question was, Ms. Bey, were
24 the doors open to the Dr. Laffer event when you
25 arrived?

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2 A. No, they were not. They were
3 blocked by protesters and U.P.D. officers.

4 Q. Okay. Well, I'm going to -- I'm
5 going to read a little more of the complaint into the
6 record. And now directing your attention to
7 paragraph one zero eight.

8 MR. MOORE: I think they need it on
9 the screen, Monique.

10 BY MR. MOORE: (Cont'g)

11 Q. And that reads as follows.
12 Paragraph one zero eight of Exhibit One, the Dr.
13 Laffer events started promptly at seven thirty
14 E.S.T., with John Restuccia the then president of
15 College Republicans providing a brief two-minute
16 introduction of Dr. Laffer. Did I read that
17 correctly, ma'am?

18 A. You did.

19 Q. Okay. Were you present when this
20 occurred?

21 A. Not in the room.

22 Q. Okay.

23 A. It's not -- I was not present.

24 Q. Did you hear what Mr. Restuccia
25 said when he made a remark?

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2 A. Not clearly, no.

3 Q. Okay. Let's go to paragraphs one
4 ten through one thirteen, I'll read these into the
5 record and then ask you questions. One ten reads as
6 follows from Exhibit One, Dr. Laffer took the podium
7 and just a few minutes -- a few seconds in a member
8 of Defendant College Progressives and/or defendant
9 PLOT stood up at the second row and began shouting
10 accusations -- accusations at Dr. Laffer. Yelling
11 we're tired of being oppressed and we are tired of
12 getting murdered by this Trump administration. And
13 you, this man, this ... Arthur Laffer supports.

14 One eleven, the disrupter then accused
15 Dr. Laffer of helping the Trump administration
16 further racial oppression in a justice system that he
17 equated with modern-day slavery. One twelve, the
18 majority of those presents -- present greeted these
19 accusations with applause and the disrupting student
20 was soon handed a megaphone and urged to continue.

21 One thirteen, although Pelletier and
22 U.P.D. had stationed several officers in the room,
23 pursuant to the speech suppression policy, they took
24 no action to prevent this student from disrupting the
25 event. Did I read that correctly, ma'am?

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2 A. That was read correctly, yes.

3 Q. Were you present when these
4 events occurred?

5 A. I was not in the room, so I was
6 not present.

7 Q. Okay. The individual who we
8 could refer to as the megaphone disruptor, did you
9 ever see this individual?

10 A. No. Again, most people were
11 black-clad and wearing masks. So if they were in the
12 room when I did come into the room, I could not have
13 recognized them.

14 Q. Okay. Do you know if the
15 megaphone disruptor was wearing a mask when he was
16 reading his statement?

17 A. I was not in the room, so no.

18 Q. Okay. Do you know if the
19 individual we've identified as the megaphone
20 disrupter was arrested by the U.P.D.?

21 A. I was not aware, no.

22 Q. Let's go to paragraph one
23 fourteen which is up on the screen right now. And
24 I'll read it into the record. College Republicans
25 who were sitting in the front row stood up and

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2 displayed free speech signs in response to the
3 disruptors. Did I read that correctly, ma'am?

4 A. Yes.

5 Q. Were you present when this
6 occurred?

7 A. No.

8 Q. Were those free speech signs
9 prepared prior to the Laffer event?

10 MR. SECHLER: Objection, lack of
11 foundation.

12 THE WITNESS: I don't know.

13 BY MR. MOORE: (Cont'g.)

14 Q. Were you aware that there were
15 free speech signs provided to the College Republicans
16 or prepared by the College Republicans prior to the
17 Laffer event?

18 A. I was not aware prior to the
19 Laffer event.

20 Q. Okay. Did you become aware of
21 the free speech signs after the Laffer event?

22 A. Through pictures, yes.

23 Q. Okay. And did you ever become
24 aware for many of your co-members of the College
25 Republicans group, which you were vice president of,

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2 where those free speech signs came from?

3 A. No.

4 Q. Did you ever ask?

5 A. No. I just assumed it was one of

6 our materials.

7 Q. Okay. Were you -- but you had no

8 involvement in the preparation of those materials?

9 A. I didn't, no.

10 Q. Okay. Do you know if defendant

11 Brian Rose was present at the Laffer event?

12 A. I don't know if he was.

13 Q. Do you know if Defendant Harvey

14 Stenger was present at the Laffer event?

15 A. I don't know if he was.

16 Q. And do you know if Defendant John

17 Pelletier was present at the Laffer event?

18 A. I don't know if he was.

19 Q. Okay. Let's go to paragraphs one

20 fifteen and one sixteen of the complaint and I'll

21 read that into the record. One fifteen, the member

22 of College Progressives and/or PLOT spoke through the

23 megaphone for nearly two minutes before U.P.D. took

24 any action to restrain him. One sixteen, ten to

25 fifteen members of College Progressives and PLOT then

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2 formed a protective barrier around the megaphone
3 wielding disruptor. Did I read that correctly,
4 ma'am?

5 A. You did read that correctly, yes.

6 Q. Were you present when any of this
7 occurred?

8 A. I was not.

9 Q. Okay. Paragraph one eighteen is
10 on the next page. I'll read that into the record.
11 One eighteen reads during these events, Pelletier
12 acting pursuant to the speech suppression policy,
13 directed the Pinkerton agents to remove Dr. Laffer
14 from the lecture hall. Did I read this correctly,
15 ma'am?

16 A. You did.

17 Q. Did you hear that occur?

18 A. No, I did not hear that occur.

19 Q. Did you -- were you present when
20 Dr. Laffer left the -- left the event?

21 A. No, I -- I -- yeah, no, I will
22 just say no. Yes.

23 Q. Okay. Did you ever see Dr.
24 Laffer at all on November 18, 2019?

25 A. I did not, no.

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2 Q. Okay. Did you ever have any
3 conversations with him at all on that date?

4 A. I did not, no.

5 Q. Did you see him after he had left
6 the lecture hall?

7 A. I did not.

8 Q. Okay. Did you talk to any
9 members of the University Police Department on
10 November 18, 2019?

11 A. I believe I did, yes.

12 Q. Okay. Who did you speak to?

13 A. I do not know the name of the
14 officer.

15 Q. And where was that officer?

16 A. In front of the door.

17 Q. Okay. And did you -- was he
18 uniformed or non -- non-uniformed?

19 A. He was uniformed.

20 Q. And what was the subject matter
21 of your conversation?

22 A. I told him that I was the Vice
23 President of College Republicans and I needed to be
24 let into the event.

25 Q. And what did he say?

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2 A. He said no.

3 Q. Okay. Did he mention the fire
4 code at all?

5 A. He did not mention the fire code,
6 no.

7 Q. Okay. Did you enter the lecture
8 hall at any point on the evening of November 18,
9 2019?

10 A. I did.

11 Q. And what did you observe when you
12 entered the lecture hall?

13 A. As the officer that I was
14 speaking to got a call on the radio, he then promptly
15 led everyone, all the protesters that were outside
16 in. I observed many, many protesters. They were --
17 I also observed, I think, maybe one or two officers
18 left. I believe Art Laffer had left just seconds
19 before. And I observed a lot of scared students who
20 I went over to console them.

21 Q. Okay. Where did you go in the
22 lecture hall?

23 A. Towards the bottom, near the
24 front.

25 Q. Okay. Who did you speak with

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2 there?

3 A. I do not know their names.

4 Q. Do you remember what you were
5 wearing that day?

6 A. I was wearing a red dress with a
7 white bow tie and black tights.

8 Q. Okay, got you. Because we do
9 have video of this. And do you remember who you
10 spoke to?

11 A. I do not know.

12 MR. SECHLER: Objection. Counsel --
13 sorry, go ahead.

14 BY MR. MOORE: (Cont'g.)

15 Q. I'm sorry. I didn't catch your
16 answer before --.

17 A. I said that I didn't know.

18 MR. SECHLER: Mr. Moore, I think you
19 you'll have start that again, sorry. I would just
20 ask Mr. Moore, for you to restate the question, I
21 object --.

22 MR. MOORE: Sorry, we have some
23 confusion here.

24 BY MR. MOORE: (Cont'g.)

25 Q. Do you remember who you spoke to

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2 if anyone in the lecture hall when you entered?

3 A. I don't know any of the names of
4 the individuals I spoke to, no.

5 Q. Were they College Republicans or
6 someone else?

7 A. They were simply members of the
8 economics and political science department.

9 Q. Okay. And did they tell you
10 anything about that evenings events?

11 A. They told me that they were
12 scared and that the police was not doing much at the
13 moment.

14 Q. Okay. And did you -- were there
15 any College Republicans in the room when you entered?

16 A. I can't recall.

17 Q. Were there any -- anybody you
18 recognize to be a member of College Progressives in
19 the room?

20 A. I did not know the members of
21 College Progressives so I would not know.

22 Q. Okay. And you've already said
23 you didn't see Dr. Laffer?

24 A. I did not.

25 Q. Did you have any other

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2 conversations you can tell us about while you were in
3 the room?

4 A. That is all I what I look for --
5 I look for students because majority of the people
6 there were black-clad wearing masks. They were still
7 screaming, I -- I could tell that they were not
8 university students. They were much older, a lot of
9 them. I went down to who I identified as students, I
10 introduced myself and I told them to calm down and
11 everything was going to be okay.

12 They recounted to me what had happened
13 a few minutes prior. And I spoke to them, just
14 telling them that we never intended for this to
15 happen. And I was sorry for what had happened to
16 them.

17 Q. And where were you located in the
18 lecture hall at that point in comparison to the
19 podium, let's say that.

20 A. Perhaps a couple of several feet
21 in front of the podium.

22 Q. Okay.

23 A. I think I was in between the
24 chairs, maybe in the first second room, perhaps. I
25 was facing -- my back was facing the podium when I

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2 was speaking to students.

3 Q. Okay. Were you -- the direction
4 you were facing in, were you on the right side of the
5 lecture hall as you look up towards the back wall or
6 the left side?

7 A. I think I was more toward the
8 left side.

9 Q. Okay.

10 A. Center left.

11 Q. Okay. Understood. What did you
12 do next?

13 A. I spoke with them for perhaps
14 maybe ten to fifteen minutes and I told them that
15 they should leave. The protestors were still there,
16 they were still screaming. I believe afterward I did
17 meet up with College Republicans that I was able to
18 find such -- I think Spencer Hayes was one of them.

19 Q. Okay. And where did you go?
20 Where did you meet up with them?

21 A. Somewhere in the lecture hall,
22 the hallway that is of course.

23 Q. Okay. Where did you go next?

24 A. I believe I went home after I
25 spoke to members of College Republicans.

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2 Q. Okay. You didn't go out to
3 dinner with anyone afterwards?

4 A. I did not.

5 Q. All right. Do you remember any
6 of the College Republicans you talked to after the
7 event, other than Spencer Hayes?

8 A. Other than Spencer Hayes, I can't
9 recall who else I spoke to.

10 Q. Okay. All right, let's go to
11 paragraph one-thirty of the complaint. And this
12 reads as follows. This is located at Exhibit One,
13 the bottom of page twenty-six, going on to page
14 twenty-seven. Before I ask this question, are you
15 aware if anyone was arrested at the scene of the
16 Laffer event?

17 A. I was not aware that anyone was
18 arrested at the scene of the Laffer event.

19 Q. Okay. In other words, are you
20 aware whether they were or whether they weren't or
21 you just don't know?

22 A. I do believe I was made aware
23 that I think up to three people were arrested after
24 the Laffer event, but during, I do not know, no.

25 Q. Okay. Got you. Let's go back to

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2 paragraph one thirty, it reads as follows. Stenger
3 and Rose did, however, cause SUNY Binghamton to take
4 action against College Republicans. The day after
5 the university had once again violated their
6 constitutional rights, the Student Association, which
7 is controlled by the SUNY Binghamton administration,
8 sent College Republicans a two-line email informing
9 them they were being suspended due to their violation
10 with both the University and Student Association
11 policy in regards to tabling without proper approval
12 on Thursday, November 14. Did I read that correctly,
13 ma'am?

14 A. Yes.

15 Q. Okay. Have you ever seen that
16 email?

17 A. No.

18 Q. Okay. I'll put it up on the
19 screen for you. This is Exhibit Thirteen. Do you
20 recognize that document, ma'am?

21 A. I don't believe so.

22 Q. Okay. Would College Republicans
23 S.A. be an email you had access to?

24 A. No.

25 Q. As vice president?

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2 A. No, I believe only John Restuccia
3 had access to it at that time.

4 Q. Okay. Fair enough. Do you
5 currently have access to that email address?

6 A. I do currently have access to
7 that email address.

8 Q. And how far back does that email
9 address go? I mean, can you access emails going back
10 to November of 2019?

11 A. I believe that I can, yes.

12 Q. Okay. Do you know who Erin
13 Bishop is there who appears to be the person who sent
14 this email?

15 A. I've heard of her name. I've
16 never met her.

17 Q. Okay. Got you. Do you see any
18 defendants and by defendants I mean, University
19 Defendants, do you see whether Harvey Stenger, Brian
20 Rose or John Pelletier were copied on this email?

21 A. I do not see where they're copied
22 on this email.

23 Q. Okay. Do you have any personal
24 knowledge whether defendant Stenger caused SUNY
25 Binghamton to take action against the College

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2 Republicans by having the S.A. suspend the College
3 Republicans?

4 A. I can't say definitively.

5 Q. Okay. Do you have any personal
6 knowledge that Defendant Brian Rose caused SUNY
7 Binghamton to take action against College Republicans
8 by having the S.A. suspend the College Republicans?

9 A. I can't say. I --.

10 Q. Well, my question is do you have
11 any personal knowledge of that?

12 MR. SECHLER: I'm -- sorry, Mr. Moore,
13 I think she was still talking.

14 MR. MOORE: Okay, go ahead.

15 THE WITNESS: I -- I was just thinking
16 of how to phrase my answer, so my -- I cannot say. I
17 don't have any personal knowledge.

18 MR. SECHLER: Yeah, Ms. Bey, certainly
19 don't reveal anything you've learned from counsel.

20 THE WITNESS: Oh, no -- no -- no -- no
21 -- no, I'm --.

22 MR. SECHLER: Okay. That's fine, you
23 don't need to respond to my -- you don't need to
24 respond to my question, thank you.

25 BY MS. MOORE: (Cont'g.)

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2 Q. I'm not asking about anything you
3 learned from counsel. I'm asking do you have any
4 personal knowledge whether defendant Stenger or Rose
5 had any involvement whatsoever in the decision to
6 send the email that we've marked as Exhibit Thirteen.

7 A. No, I can't say that they had any
8 direct involvement specifically.

9 Q. Okay. Just to read that email,
10 it says, good morning. I am emailing to inform you
11 that the B-There account for College Republicans has
12 been suspended. That's the first sentence, correct?

13 A. Yes, it is.

14 Q. Is it your understanding that the
15 B-There account for College Republicans was suspended
16 as of November 19, 2019?

17 A. Yes, I was told this by John
18 Restuccia immediately.

19 Q. Okay, got you. Is the B-There
20 account the same thing as the charter for the College
21 Republicans?

22 A. It is not, no. It is the
23 reservation system.

24 Q. Do you know in November 2019,
25 whether any other action was taken against the

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2 College Republicans, other than that detailed in
3 Exhibit Thirteen?

4 A. On the 19th, no.

5 Q. Okay. Was there any other action
6 taken during the calendar year 2019?

7 A. I believe during the calendar
8 year 2019, our full charter was removed and knocked
9 down to a professional charter.

10 Q. Okay. And how do you -- what is
11 this -- your source of knowledge for that?

12 A. John Restuccia.

13 Q. Do you -- are you in possession
14 of any documents which would support the contention
15 that the College Republicans charter was removed?

16 MR. SECHLER: Objection to form. I'm
17 sorry, Ms. Bey, just if you can give me a second to
18 make an objection.

19 THE WITNESS: Okay.

20 MR. SECHLER: Objection to form, go
21 ahead.

22 THE WITNESS: This was a verbal
23 conversation.

24 BY MR. MOORE: (Cont'g.)

25 Q. Okay. You don't have any

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2 documentation to support that in other words?

3 A. I don't.

4 Q. Okay. Got you. Do you know if
5 John Restuccia responded to the email marked as
6 Exhibit Thirteen?

7 A. I wouldn't know.

8 Q. Okay. Let's go to paragraph one
9 thirty-one of the complaint? And that reads as
10 follows. Exhibit One, paragraph one thirty-one.
11 Upon information and belief, Stenger, Rose and the
12 Student Association have not required other groups to
13 obtain approval before tabling on campus. Did I read
14 that correctly, ma'am?

15 A. Yes, you did.

16 Q. Do you have any personal
17 knowledge of the contentions set forth in paragraph
18 one thirty-one of the complaint?

19 A. It's a little strangely worded.

20 Q. Okay. Well, do you have any
21 personal knowledge that Stenger or Rose have not
22 required other groups to obtain approval before
23 tabling on campus?

24 A. I don't have any direct knowledge
25 of that, no.

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2 Q. Okay. Do you have any knowledge
3 whether the Student Association have not required
4 other groups to obtain approval before tabling on
5 campus?

6 A. I don't have any direct
7 knowledge, no.

8 Q. Okay, thank you. Paragraph one
9 thirty-two, is -- I will read that into the record
10 from Exhibit One, this punishment was an
11 unconstitutional enforcement of the University's
12 tabling policy because it was motivated not by
13 College Republicans' decision not to obtain a permit,
14 but by Stenger, Rose and the Student Association's
15 disagreement with College Republicans and Y.A.S.
16 views. Did I read that correctly, ma'am?

17 A. Yes, you did.

18 Q. Do you have any personal
19 knowledge whether Defendant Stenger disagreed with
20 the College Republicans' views?

21 A. I don't have any personal
22 knowledge of this, no.

23 Q. Do you have any personal
24 knowledge whether Defendant Stenger disagreed with
25 the Young America's Foundation's views?

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2 A. No, I don't have any personal
3 knowledge of this, no.

4 Q. Do you have any personal
5 knowledge of whether Defendant Rose disagreed with
6 the College Republicans' views?

7 A. I don't have any personal
8 knowledge of this, no.

9 Q. Do you have any personal
10 knowledge whether Defendant Rose disagreed with Young
11 America's Foundation's views?

12 A. I don't have any knowledge of
13 that, no.

14 Q. Okay. How long was the College
15 Republicans' B-There account suspended for?

16 A. For over two years.

17 Q. Okay. Was any effort made to
18 appeal that suspension or to reinstate the College
19 Republicans' B-There account?

20 MR. SECHLER: Objection.

21 MR. MOORE: During that two-year
22 period.

23 MR. SECHLER: Objection, lack of
24 foundation.

25 BY MR. MOORE: (Cont'g.)

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2 Q. I didn't hear your answer, ma'am.

3 A. I would not know. I was not on
4 the e-board.

5 Q. Okay. Let's go to Exhibit
6 Thirty-two. And you can scroll down a little and
7 this appears to be an email from Kyle Nelson to two
8 email addresses at the Binghamton S.A. Would you
9 agree with me there?

10 A. Yes, actually no, it appears --
11 okay, there it is, okay, it was appearing great for
12 me. ... looks like.

13 Q. Can you take a moment and read
14 that email, please, ma'am, and then tell me when
15 you've read it and I'll ask questions.

16 A. Okay.

17 Q. Thank you.

18 A. I read it.

19 Q. Okay. Have you ever seen this
20 email before today, ma'am?

21 A. I've never seen this email before
22 today.

23 Q. Okay. Would you agree with me
24 that it's dated Friday, July 10, 2020?

25 A. It is, yes.

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2 Q. And you know who Kyle Nelson is,
3 correct?

4 A. I do.

5 Q. And is it -- do you -- do you
6 agree with the fact that he was the treasurer of the
7 College Republicans at Binghamton University on that
8 date?

9 A. I now recall, yes.

10 Q. Okay. Is it your understanding
11 that the executive board members are set forth -- at
12 that time were as set forth in that email address?

13 A. Yes.

14 Q. And do you see the email that
15 starts during the previous school year?

16 A. Yes.

17 Q. It says during the previous
18 school year in between semesters extenuating
19 circumstances led to our club selecting a new
20 executive board to represent and oversee our club's
21 activities. This created confusion surrounding vital
22 club information, such as account information,
23 passwords and overall familiarity with the current
24 situation following the S.A.'s decision to give our
25 club a one-semester ban as a result of what unfolded

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2 during our tabling speaking events.

3 This confusion and lack of clarity for
4 our club's new officers prevented us from completing
5 the necessary steps in a timely fashion as well as
6 limited our ability to maintain consistent account
7 activity. Did I read that correctly, ma'am?

8 A. You did read it correctly.

9 Q. Do you know if this is an
10 accurate statement by Mr. Nelson?

11 MR. SECHLER: Objection, foundation.

12 BY MR. MOORE: (Cont'g.)

13 Q. I didn't hear your answer, ma'am.

14 A. I can't. I -- I -- I believe
15 that it's a question for Kyle to answer. I cannot
16 say. I was not on the board at the moment.

17 Q. Okay, all right. Do you know if
18 any of those four individuals on the executive board
19 members for the College Republicans went through any
20 steps to reestablish the College Republicans' B-There
21 account following this email address?

22 A. I personally do not know.

23 Q. Okay. So it might have happened,
24 it might not have happened, you just don't know?

25 A. I might not know, and with COVID,

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2 B-There was a useless system, so I don't know.

3 Q. Okay. But you weren't there at
4 the time, correct?

5 A. At the time I believe, yes. This
6 is when I began to take off, yes.

7 Q. You were not a student at B.U.
8 during the 2020-2021 school year. Is that correct?

9 A. Yes.

10 Q. Okay. So what occurred with the
11 College Republicans during that time would that have
12 been something you were aware of? Is that a fair
13 statement?

14 A. Sorry, other -- other than what
15 happened in the chat between -- for College
16 Republicans, I'm -- no, I was not aware of anything
17 that happened --

18 Q. Okay.

19 A. -- during official channels.

20 Q. Okay. Got you.

21 MR. MOORE: Can we go to paragraph one
22 thirty-four of the complaint, please, Monique? And
23 this is at page twenty-seven, which I believe is up
24 there.

25 BY MR. MOORE: (Cont'g.)

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2 Q. And it reads as follows,

3 paragraph one thirty-four, Exhibit One, Plaintiff's

4 College Republicans and Lizak met with Defendants

5 Stenger, Rose on January 20, 2020, to discuss the

6 tabling incident and the Dr. Laffer event. This

7 meeting was facilitated by Congress -- Congressman

8 Thomas Reid, the U.S. representative for New York's

9 23rd congressional district, who also attended. Did

10 I read that correctly, ma'am?

11 A. You did, yes.

12 Q. Were you present for this

13 meeting?

14 A. I was not present for this

15 meeting, no.

16 Q. Okay. Let's move on to paragraph

17 one forty-five of the complaint. I'll read that into

18 the record, this is Exhibit one paragraph one forty-

19 five. By failing to perform their constitutional

20 duty to protect Plaintiff's free speech activity in

21 the form of the Dr. Laffer event and by actively

22 encouraging participating and permitting the

23 disruption of that event, Stenger, Rose and Pelletier

24 caused financial damages to Plaintiffs totaling

25 thirty-seven thousand seven hundred and seventeen

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2 dollars and ninety-three cents.

3 This total includes Dr. Laffer's
4 honorarium, transportation and private security,
5 Y.A.S. flights, transportation, meals and
6 accommodations, and the hiring of an event
7 photographer and mailing and marketing materials.
8 Did I read that correctly, ma'am?

9 A. Yes.

10 Q. Do you know who paid the thirty-
11 seven thousand dollars seven hundred and seventeen
12 thousand dollars and ninety-three cents that are
13 specified in that paragraph?

14 A. I do not know the specific
15 individuals. I was told by John Restuccia that they
16 were donors.

17 Q. You were told by whom?

18 A. John Restuccia.

19 Q. Okay. Did any of that thirty-
20 seven thousand dollars and change come from College
21 Republicans' funds?

22 MR. SECHLER: Objection to form.

23 THE WITNESS: I would not know. I was
24 not treasurer.

25 BY MR. MOORE: (Cont'g.)

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2 Q. Okay, got you. Did you have any
3 personal knowledge regarding who paid that amount
4 that is specified in that paragraph?

5 A. I do not know.

6 Q. Okay. Paragraph one forty-six,
7 it reads as follows. Plaintiffs' desire to once
8 again host Dr. Laffer and similar speakers on SUNY
9 Binghamton's campus. However, Plaintiffs reasonably
10 fear if they do Stenger, Rose and Pelletier will
11 again enforce the speech suppression policy to
12 conspire with, encourage and permit disruptors,
13 including College Progressives and PLOT to engage in
14 disruptive and disorderly conduct designed to
15 suppress Plaintiff's message. Did I read that
16 correctly, ma'am?

17 A. Yes, you did.

18 Q. Have -- the College Republicans
19 have hosted some speakers on campus during the -- the
20 fall semester 2022, correct?

21 A. Yes.

22 Q. And that included Taylor McGee
23 from Students for Life, correct?

24 A. Yes.

25 Q. And the New York assembly

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2 candidates Sophia Resciniti, is that correct?

3 A. Resciniti, yes.

4 Q. Okay. R-E-S-C-I-N-I-T-I, is that
5 correct?

6 A. Yes.

7 Q. All right. And former
8 congressional candidate George Phillips also spoke up
9 on --

10 A. Yes.

11 Q. -- a couple of occasions. Is
12 that correct?

13 A. Twice, yes.

14 Q. Okay. Got you. All right. Did
15 you ever attempt to host any other speakers before
16 October 2022?

17 MR. SECHLER: Objection, foundation.

18 MR. MOORE: You can answer.

19 THE WITNESS: No, as we were just
20 starting back on.

21 BY MR. MOORE: (Cont'g.)

22 Q. Okay. Did the College
23 Republicans make any effort to bring Dr. Laffer back
24 to campus --

25 MR. SECHLER: Objection.

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2 BY MR. MOORE: (Cont'g.)

3 Q. -- in November 2019.

4 A. No, due to no longer having
5 funding, no.

6 Q. Okay.

7 MR. MOORE: Tom, do you have any
8 questions?

9 THE WITNESS: Do -- do I have any
10 questions?

11 MR. MOORE: No, there's -- there's an
12 attorney for the Student Association, who I see on
13 our screen. I don't know if he's going to ask any
14 questions. But Tom, do you have any questions?

15 MR. SECHLER: Yeah, I just have a few.

16 MR. MOORE: Okay, go ahead.

17 MR. SECHLER: I'm going to -- I'm
18 going to pass it off to Thomas.

19 CROSS-EXAMINATION

20 BY MR. SAITTA:

21 Q. Okay. Ms. Bey, you mentioned
22 that the charter was revoked after the Laffer event.
23 When you use the term revoking the charter, what do
24 you mean by that?

25 A. I believe that it was knocked

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2 down to a provisional charter.

3 Q. Okay. And what do you mean by
4 provisional charter?

5 A. I am not the S.A. e-board, so I
6 don't believe I can properly define provisional
7 charter. It is simply the charter that comes before
8 a full charter.

9 Q. Okay. But at -- at the time in
10 2019, the College Republicans was fully chartered,
11 correct?

12 A. Yes.

13 Q. Do you have any first-hand
14 knowledge that the S.A. revoked their charter after
15 2019?

16 A. No, I do not.

17 Q. Okay. And -- and is it fair to
18 say that revoking the charter is more than just
19 suspending their B-There account, correct?

20 A. I cannot say.

21 Q. So you don't know that -- what
22 you're saying is you don't know the difference
23 between suspending the B-There account and revoking
24 the organization's charter?

25 A. I assume that suspending of B-

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2 There account is in line with revoking an
3 organization's charter. But I do not -- I did not
4 handle that. So I do not know the full provisions of
5 that. I -- I can only speak about my experience
6 getting back the full charter.

7 Q. Okay. When you say getting back
8 to full charter, did you have to reapply for a
9 charter?

10 A. Since we had a provisional
11 charter, we did not have to reapply. We didn't have
12 to go through the process of starting with no charter
13 getting a provisional charter and then waiting the
14 period to get a full charter. But we did have to
15 apply to reregister organization and receive a full
16 charter again, yes.

17 Q. Okay. Are you aware of the fact
18 that all student organizations, not just the College
19 Republicans, have to recertify in the spring of every
20 school semester for the next semester?

21 MR. MOORE: Objection, lack of --.

22 THE WITNESS: They have to -- I'm
23 sorry.

24 MR. MOORE: Objection, lack of
25 foundation. Go ahead, Ms. Bey.

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2 THE WITNESS: I understand that all

3 organizations have to re-register, not all

4 organizations has to re-charter.

5 BY MR. SAITTA: (Cont'g.)

6 Q. Okay. And are you aware that in

7 the -- do you know whether or not the College

8 Republicans reregistered or recertified in the spring

9 of 2020?

10 MR. MOORE: Objection.

11 THE WITNESS: I do not know.

12 BY MR. SAITTA: (Cont'g.)

13 Q. Okay. And I'll ask you again to

14 look at Exhibit Thirty-two.

15 A. Okay.

16 Q. And that's from Kyle Nelson, who

17 was a College Republican board member?

18 A. It is from him, yes.

19 Q. Okay. And he refers to the

20 accounts being frozen due to failure to re-register

21 or inactivity. Do you see that?

22 A. I see that, yes.

23 Q. Okay. Do you have any knowledge

24 as to whether or not the College Republicans failed

25 to register and they were put on inactive status as

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2 opposed to provisional?

3 MR. MOORE: Objection, foundation.

4 THE WITNESS: I was not a member of
5 the e-board at the time so I cannot say.

6 BY MR. SAITTA: (Cont'g.)

7 Q. Okay. As a member of the e-
8 board, do you -- are you familiar with the policy of
9 making a student -- student organization inactive if
10 they don't re-register in a timely fashion?

11 A. I believe so yes.

12 Q. Okay. And in fact, wasn't it the
13 case in this -- with the College Republicans that
14 they were able -- taken off of inactive status in the
15 fall of 2020 because they met with Ms.
16 (unintelligible)?

17 MR. MOORE: Objection, lack of
18 foundation.

19 THE WITNESS: I don't who that is.

20 BY MR. SAITTA: (Cont'g.)

21 Q. Excuse me?

22 A. I don't know who that is.

23 Q. Okay. Are you -- are you aware
24 of whether or not the College Republican e-board met
25 with your representative with the Student Association

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2 so that they can be taken off of inactive status?

3 A. I was not a part of the e-board.
4 So I'm not aware.

5 Q. So you don't know one way or the
6 other, do you?

7 A. I -- I don't know. That's a
8 matter for the e-board.

9 Q. Okay. And where do you -- if you
10 know, if -- if a student organization is put on
11 inactive status, does that also affect their B-There
12 account and other accounts with the university?

13 MR. MOORE: Objection, foundation

14 THE WITNESS: I don't know.

15 BY MR. SAITTA: (Cont'g.)

16 Q. Okay. Now, you mentioned that
17 the B-There account was suspended for two years and
18 is it your testimony that it was suspended for two
19 years starting with the suspension in 2019 in the
20 fall?

21 A. Yes.

22 Q. Okay. And what's your basis of
23 your knowledge that it last for -- the suspension
24 extended for two years?

25 A. When Kyle Nelson was the

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2 President of College Republicans, I had to -- I
3 confronted him and I asked him why we were not
4 meeting -- why we were not meeting in a registered
5 room as he informed me that we did not have either
6 status due to not having registration and not having
7 a full charter either that I had to deal with when I
8 became president.

9 Q. Okay. So he -- so he basically
10 told you that that issue was not -- was deal with the
11 fact that he -- withdrawn. What he told you was that
12 the lack of the B-There account was due to their not
13 having re-registered. Is that correct?

14 MR. MOORE: Objection,
15 mischaracterizes testimony.

16 BY MR. SAITTA: (Cont'g.)

17 Q. If you can answer.

18 A. No, that is not what he told me.

19 Q. Okay. And what did he tell you
20 was the reason why the B-There account was not
21 available?

22 A. He simply told me it was to -- he
23 just told me that it wasn't available as I mentioned,
24 I learned when I tried to and I had to re-register,
25 why we did not have a B-There account. He was not

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2 the person who informed me that.

3 Q. Who would inform you?

4 A. Charter.

5 Q. Okay. Who informed you when --
6 why the account had been suspended?

7 A. The current E.V.P.

8 Q. Who was that?

9 A. Daniel Rockenboggle.

10 Q. Okay. You're talking about the
11 E.V.P. of the S.A.?

12 A. Yes.

13 Q. And -- and you're claiming he
14 told you that the B-There account for the College
15 Republican was suspended because of the tabling
16 incident or for some other reason?

17 A. No, he simply told us that we
18 don't have a B-There account due to not having a --
19 due to one, not being registered and two, due to not
20 having a full charter.

21 Q. Okay. And he specifically told
22 you you didn't have a full charter?

23 A. Yes.

24 Q. Okay. All right. And are you --
25 and if you've already answered this I apologize.

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2 Were you at SUNY Binghamton during the summer of
3 2020?

4 A. I was not, no.

5 Q. Okay. And how about in the fall
6 of 2020?

7 A. I was not, no.

8 Q. Okay. So you would have no
9 personal knowledge as to whether or not the college
10 Republican status was put back to a full status
11 during that semester, the fall of 2020?

12 A. I would not know, no.

13 Q. Okay. Just finally, when we
14 talked about getting the permit for the B-There
15 account, the -- the S.A. does not approve those
16 requests, correct?

17 MR. MOORE: Objection, foundation.

18 BY MR. SAITTA: (Cont'g.)

19 Q. If you can answer.

20 A. As far as I am concerned, the
21 current system -- the way that the current system
22 works is that a person from the dean's office,
23 currently her name is Catherine Vaughn, when you
24 submit a request for a permit for a room or for a
25 table, she approves it -- approves of it unless for

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2 certain tables, the Multicultural Center. But I do
3 not know because I -- I did not have access to B-
4 There in 2019, so I do not know how the system worked
5 back then.

6 Q. Okay. So is it fair to say you
7 have no knowledge in 2000 -- as of 2019 whether the
8 S.A. had any role in approving requests for tabling?

9 A. I do not know.

10 MR. SAITTA: Okay. Those are the all
11 the questions I have, thank you.

12 MR. MOORE: I have a couple of quick
13 follow-ups, Ms. Bey, and we'll try and get you out of
14 here.

15 RE-DIRECT EXAMINATION

16 BY MR. MOORE:

17 Q. Do you have any personal
18 knowledge of what a speech suppression policy at
19 Binghamton University is?

20 A. I do not have any personal
21 knowledge.

22 Q. Okay. You -- you spoke about
23 S.A.'s Daniel Rockenboggle advising you that the
24 College Republicans did not have a B-There account,
25 would you assume -- we assume ... of president,

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2 correct?

3 A. Yes.

4 Q. And he said that the College
5 Republicans were not registered and had no full
6 charter, is that your testimony?

7 A. Yes.

8 Q. And did -- do you have any
9 personal knowledge whether Defendant Stenger was
10 involved in that, the fact that the College
11 Republicans were not registered?

12 A. I would not know.

13 Q. Do you have any personal
14 knowledge whether Defendant Stenger is involved in
15 whether or not the College Republicans were at that
16 time chartered?

17 A. I do not know.

18 Q. Do you have any personal
19 knowledge whether Defendant Brian Rose had any
20 involvement in the registration of the College
21 Republicans as of the time you had that conversation
22 with Daniel, the E.V.P. of Binghamton S.A.?

23 A. No, I don't believe so.

24 Q. And do you have any personal
25 knowledge whether Defendant Rose was involved in the

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2 status of the College Republican's charter when you
3 have that conversation with Daniel from S.A.?

4 A. I'm not aware of such a thing
5 happening.

6 Q. Okay. You testified about Logan
7 Blakeslee a little earlier, do you remember that?

8 A. Yes.

9 Q. You -- did you read Mr.
10 Blakeslee's op-ed about John Lizak? It was written
11 in the school paper.

12 MR. SECHLER: Objection. I'm sorry,
13 you tendered the witness, I thought you were going to
14 just ask follow-ups to Mr. Saitta's questioning.

15 MR. MOORE: I'm asking another
16 question, Phil. It's my deposition, I can ask
17 another question.

18 MR. SECHLER: Well, not --.

19 MR. MOORE: I don't need to redirect,
20 there's -- there's no rule against this.

21 MR. SECHLER: I do think when you
22 tender the witness, you tender the witness. But I'm
23 not going to instruct the witness not to answer but I
24 don't think you can go back and forth like this. I
25 think that's inappropriate.

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2 MR. MOORE: It hasn't been our

3 practice, but your objection is noted.

4 BY MR. MOORE: (Cont'g.)

5 Q. Ma'am, did you read that article?

6 A. I did, but it was a very long

7 time ago when I did.

8 Q. Okay. All right.

9 MR. MOORE: That's all I have, thanks.

10 MR. SECHLER: Thank you, Ms. Bey, we

11 have nothing.

12 (The deposition concluded at 1:44

13 p.m.)

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2 STATE OF)
3 COUNTY OF)

4 I, REIN BEY, have read the foregoing record of
5 my testimony taken at the time and place noted in the
6 heading hereof and do hereby acknowledge:

7 (Please check one)

8 () That it is a true and correct transcript of
9 same.

10 () With the exceptions noted in the attached
11 errata sheet, it is a true and correct transcript of same.

12

X

REIN BEY

13

14 Sworn to before me this
15 _____ day of _____, 2023.

16 X _____

17 NOTARY PUBLIC

18 My Commission Expires:

19 _____

20

21

22

23

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25

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2 I, MONIQUE HINES, do hereby certify that the

3 foregoing testimony of REIN BEY was taken by me, in the

4 cause, at the time and place, and in the presence of

5 counsel, as stated in the caption hereto, at Page 1

6 hereof; that before giving testimony said witness was duly

7 sworn to testify the truth, the whole truth and nothing

8 but the truth; that the foregoing typewritten

9 transcription, consisting of pages number 1 to 180,

10 inclusive, is a true record prepared by me and completed

11 by Associated Reporters Int'l., Inc. from materials

12 provided by me.

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14 MONIQUE HINES, Reporter

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3 (800) 523-7887

4 Date:
5 Case Name: Young America's, et al v Stenger, et al
6 Index Number: 20-CV-822 (LEK/ML)
7 Deponent: Rein Bey
8 Deposition Date: 3/03/2023
9 Examining Attorney: John Moore, A.A.G.

10 Dear Rein Bey:

11 Please read and make any changes and/or corrections in
12 your testimony and sign the transcript in the presence of
13 a notary public. Please do so within thirty (30) days.
14 If you fail to sign the transcript within thirty (30)
15 days, it will be delivered to the appropriate parties
16 without signature. Return the transcript with
17 corrections, if any, to:

18 OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL
19 BY: JOHN MOORE, A.A.G.
20 The Capitol
21 Albany, New York 12224

22 CORRECTIONS:

23 _____ Word or phrase: _____
24 _____ Corrected to: _____
25 _____ Word or phrase: _____
_____ Corrected to: _____
_____ Word or phrase: _____
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